

Kami E. Quinn
Gilbert LLP
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gotofirm.com

*Co-Counsel to the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants*

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.¹

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:
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Chapter 11

Case No. 19-23649 (RDD)

(Jointly Administered)

**EIGHTEENTH MONTHLY FEE STATEMENT OF GILBERT LLP,
FOR ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED AS CO-COUNSEL TO THE AD HOC
COMMITTEE OF GOVERNMENTAL AND OTHER CONTINGENT LITIGATION
CLAIMANTS FOR THE PERIOD MARCH 1, 2021 THROUGH MARCH 31, 2021**

¹ The Debtors in these cases, along with the last four digits of each Debtor's registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors' corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

| | |
|--|---|
| Name of Applicant: | Gilbert LLP |
| Authorized to provide professional services to: | Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants |
| Date of Order Approving Debtors' Payment of Fees and Expenses of Applicant: | December 2, 2019 (Docket #553) |
| Period for which compensation and reimbursement is sought: | March 1, 2021 through March 31, 2021 |
| Amount of compensation sought as actual, reasonable, and necessary: | \$530,393.20 (80% of \$662,991.50) |
| Amount of expense reimbursement sought as actual, reasonable and necessary: | \$2,804.54 (100%) |
| This is a: | Monthly Fee Statement |

Pursuant to 11 U.S.C. §§ 105(a), 363(b), and 365 of title 11 of the United States Code (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the *Order Authorizing the Debtors to Assume the Reimbursement Agreement and Pay the Fees and Expenses of the Ad Hoc Committee’s Professionals* entered by this Court on December 2, 2019 [Docket #553] (the “**Reimbursement Order**”), and the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket #529] (the “**Procedures Order**”), the law firm of Gilbert LLP (“**Gilbert LLP**”), Co-Counsel to the Ad Hoc Committee of Governmental and Other Contingent Litigation Claimants (the “**AHC**”), hereby submits this eighteenth monthly fee statement (the “**Monthly Fee Statement**”) for legal services rendered and reimbursement for expenses incurred for the period commencing March 1, 2021 through March 31, 2021 (the “**Application Period**”).

Itemization of Services Rendered and Expenses Incurred

1. Annexed hereto as **Exhibit A** is a chart of the aggregate number of hours expended and fees incurred by professionals and paraprofessionals during the Application Period by project category. As reflected on Exhibit A, Gilbert LLP incurred \$662,991.50 in fees during

the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 80% of such fees, totaling \$530,393.20.

2. Annexed hereto as **Exhibit B** is a chart of Gilbert LLP's professionals and paraprofessionals, including title, hourly rate, number of hours billed, and total fees of each attorney and paraprofessional who rendered services to the AHC in connection with these chapter 11 proceedings during the Application Period. The blended hourly rate of the attorneys during the Application Period is \$968.98. The blended hourly rate of paraprofessionals during the Application Period is \$254.14.

3. Annexed hereto as **Exhibit C** is the summary of reasonable and necessary expenses incurred during the Application Period. As reflected on Exhibit C, Gilbert LLP incurred \$2,804.54 in expenses during the Application Period. Pursuant to this Monthly Fee Statement, Gilbert LLP seeks reimbursement of 100% of such expenses, totaling \$2,804.54.

4. Annexed hereto as **Exhibit D** are the time records of Gilbert LLP for the Application Period, organized by project category with a daily log detailing the time spent by each professional and an itemization of expenses.

FILING AND SERVICE

5. This Monthly Fee Statement will be filed and served in accordance with the directives in the Procedures Order.

6. Pursuant to the Procedures Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, within 14 days of service of the Monthly Fee Statement, serve via email, to the Notice Parties (as defined in the Procedures Order), a written notice setting forth the precise nature of the objection and the amount at issue.

7. If an objection is timely served pursuant to the Procedures Order, the Debtors shall be authorized and directed to pay Gilbert LLP the amount equal to 80% of the fees and 100% of the expenses that are not subject to an objection. Any objection must set forth the precise nature of the objection and the amount at issue. It shall not be sufficient to simply object to all fees and expenses.

WHEREFORE, Gilbert LLP respectfully requests compensation in the amount of \$530,393.20 (80% of \$662,991.50) and reimbursement of reasonable and necessary expenses incurred in the amount of \$2,804.54 (100%), for a total amount of \$533,197.74, for the Application Period.

Dated: May 25, 2021
Washington, DC

Respectfully submitted,

GILBERT LLP

/s/ Kami E. Quinn

Kami E. Quinn
700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
Tele: 202.772.2200
Fax: 202.772.3333
Email: quinnk@gotofirm.com

*Counsel for the Ad Hoc Committee of
Governmental and Other Contingent
Litigation Claimants.*

Exhibit A

Summary of Services by Category

SUMMARY OF SERVICES BY PROJECT CATEGORY

| Project Code | Project Category | Hours Billed in Period | Fees for Period |
|---------------------|--|-------------------------------|------------------------|
| A001 | Asset Analysis & Recovery | 19.9 | \$16,764.50 |
| A004 | Case Administration | 11.1 | \$17,482.50 |
| A006 | Employment / Fee Applications | 8.2 | \$2,993.00 |
| A009 | Meetings / Communications with AHC & Creditors | 54.1 | \$64,742.50 |
| A019 | Plan of Reorganization / Disclosure Statement | 309.6 | \$301,329.00 |
| A020 | Insurance Adversary Proceeding | 312.3 | \$259,680.00 |
| | | 715.2 | \$662,991.50 |

Exhibit B

Summary of Compensation by Professional

SUMMARY OF COMPENSATION BY PROFESSIONAL

| Name of Professional | Position / Year Admitted to Practice | Hourly Billing Rate² | Hours Billed for Period | Total Fees for Period |
|-----------------------------|---|--|--------------------------------|------------------------------|
| Scott D. Gilbert | Partner / District of Columbia - 1979 U.S. Court of Appeals for the District of Columbia – 1980 U.S. Court of International Trade - 1984 U.S. Supreme Court - 1987 U.S. District Court for the District of Columbia – 2008 Cherokee Nation - 2017 U.S. Court of Federal Claims - 2019 | \$1,700.00 | 95.6 | \$162,520.00 |
| Kami E. Quinn | Partner / Commonwealth of Virginia – 2000 District of Columbia – 2006 U.S. Court of Appeals for the Third Circuit – 2009 | \$1,100.00 | 37.2 | \$40,920.00 |
| Richard Leveridge | Partner / District of Columbia – 1981 State of New York - 1997 | \$1,400.00 | 75.2 | \$105,280.00 |
| Richard Shore | Partner / State of New York – 1988 District of Columbia – 1989 U.S. Court of Appeals for the Third Circuit – 2009 U.S. Court of Appeals for the Fourth Circuit – 2014 U.S. Court of Appeals for the Ninth Circuit – 2014 U.S. Court of Appeals for the Fifth Circuit – 2017 Cherokee Nation – 2017 | \$1,350.00 | 58.1 | \$78,435.00 |
| Jason Rubinstein | Partner / State of Maryland – 2006 District of Columbia – 2007 U.S. District Court for the District of Maryland – 2007 U.S. District Court for the District of Columbia – 2011 | \$800.00 | 44.1 | \$35,280.00 |
| Jenna Hudson | Partner / State of Maryland – 2010 State of Massachusetts – 2010 District of Columbia - 2011 U.S. District Court for the District of Maryland – 2011 U.S. Court of Appeals for the First Circuit – 2015 U.S. Supreme Court - 2016 Cherokee Nation – 2017 U.S. District Court for the District of Columbia - 2019 | \$725.00 | 91.3 | \$66,192.50 |
| Emily Grim | Partner / Commonwealth of Pennsylvania – 2010 State of Illinois – 2010 District of Columbia – 2012 U.S. District Court for the District of Columbia - 2016 U.S. Court of Federal Claims – 2020 | \$700.00 | 48.1 | \$33,670.00 |
| Dan Wolf | Partner / State of New York – 2011 District of Columbia – 2013 Southern District of New York – 2011 U.S. Court of Appeals for the Ninth Circuit – 2012 | \$700.00 | 53.8 | \$37,660.00 |

2 Gilbert's hourly rates are reviewed from time to time and are subject to periodic adjustment. In the ordinary course of Gilbert's business and in keeping with the firm's established billing procedures, Gilbert adjusted its standard billing rates effective as of February 1, 2021.

| Name of Professional | Position / Year Admitted to Practice | Hourly Billing Rate² | Hours Billed for Period | Total Fees for Period |
|-----------------------------|---|--|--------------------------------|------------------------------|
| Mike Rush | Of Counsel / State of Delaware – 2007 District of Columbia 2017 | \$675.00 | 18.5 | \$12,487.50 |
| Sarah Sraders | Associate / State of New York – 2016 District of Columbia – 2017 | \$575.00 | 56.3 | \$32,372.50 |
| Alison Gaske | Associate / District of Columbia – 2016 | \$500.00 | 95.0 | \$47,500.00 |
| Lauren Fastenau | Paralegal – Joined firm in 2019 | \$315.00 | 7.2 | \$2,268.00 |
| Katherine Johnson | Paralegal – Joined firm in 2018 | \$230.00 | 23.6 | \$5,428.00 |
| Sara Ogrey | Paralegal – Joined firm in 2019 | \$230.00 | 4.5 | \$1,035.00 |
| Peggy Holland | Litigation Specialist – Joined firm in 2002 | \$290.00 | 6.7 | \$1,943.00 |
| | Totals | | 715.2 | \$662,991.50 |
| | Attorney Blended Rate | \$968.98 | | |
| | Paraprofessional Blended Rate | \$254.14 | | |

Exhibit C

Summary of Expenses Incurred

SUMMARY OF EXPENSES INCURRED

| DESCRIPTION | Total Expenses for Period |
|------------------------------|--------------------------------------|
| Business Meals | \$69.57 |
| Conference Calls / CourtCall | \$70.00 |
| Lexis | \$293.47 |
| Pacer | \$136.60 |
| Westlaw | \$2,234.90 |
| Total | \$2,804.54 |

Exhibit D

Time and Expense Detail

GILBERT LLP

700 Pennsylvania Avenue, SE
Suite 400
Washington, DC 20003
O 202.772.2200
F 202.772.3333
GilbertLegal.com

Ad Hoc Committee
c/o Marshall S. Huebner
Davis Polk & Wardwell LLP
450 Lexington Avenue
New York, NY 10017

May 25, 2021
Invoice Number: 11323050
Client Number: 1599
Tax ID: 52-2283869

FOR PROFESSIONAL SERVICES RENDERED through March 31, 2021

Re: Ad Hoc Committee (Purdue)

| Matter Description | Fees | Costs | Total |
|---------------------------|-------------------|-----------------|-------------------|
| Purdue Bankruptcy | 662,991.50 | 2,804.54 | 665,796.04 |
| Total | 662,991.50 | 2,804.54 | 665,796.04 |

TOTAL FEES \$ 662,991.50

TOTAL EXPENSES \$ 2,804.54

TOTAL FEES AND EXPENSES \$ 665,796.04

FOR PROFESSIONAL SERVICES RENDERED through March 31, 2021

Purdue Bankruptcy

A001: Asset Analysis & Recovery

| Name | Date | Services | Hours | Amount |
|-------------|-------------|---|--------------|---------------|
| Quinn, K. | 3/01/21 | Analyze insurance-related common interest with MSGE. | .20 | 220.00 |
| Quinn, K. | 3/01/21 | Confer with bankruptcy, litigation and insurance recovery teams re insurance recovery status and strategy. | .60 | 660.00 |
| Shore, R. | 3/01/21 | Confer with insurance, bankruptcy and litigation teams re insurance status and strategy. | .60 | 810.00 |
| Hudson, J. | 3/01/21 | Confer with bankruptcy team (K. Quinn, E. Grim, S. Sraders), litigation team (R. Leveridge, J. Rubinstein, M. Rush), and insurance recovery team (R. Shore, A. Gaske) re status and strategy. | .60 | 435.00 |
| Hudson, J. | 3/01/21 | Analyze next steps for insurance recovery. | .40 | 290.00 |
| Hudson, J. | 3/01/21 | Confirm interaction between various policies in Bermuda-form program. | .10 | 72.50 |
| Hudson, J. | 3/01/21 | Analyze common interest re insurance with MSGE | .20 | 145.00 |
| Grim, E. | 3/01/21 | Confer with bankruptcy team (K. Quinn, S. Sraders), litigation team (R. Leveridge, J. Rubinstein), and insurance recovery team (R. Shore, J. Hudson, A. Gaske) re status and strategy. | .60 | 420.00 |
| Gaske, A. | 3/01/21 | Confer with bankruptcy team (K. Quinn, S. Sraders), litigation team (R. Leveridge, J. Rubinstein, M. Rush), and insurance recovery team (R. Shore and J. Hudson) re status and strategy. | .60 | 300.00 |
| Sraders, S. | 3/01/21 | Confer with bankruptcy team (K. Quinn, E. Grim), litigation team (R. Leveridge, J. Rubinstein, M. Rush), and insurance recovery team (R. Shore, J. Hudson, A. Gaske) re status and strategy. | .60 | 345.00 |
| Gilbert, S. | 3/02/21 | Analyze issues re McKinsey. | .50 | 850.00 |
| Ogrey, S. | 3/02/21 | Update master cases tracking sheet for non-MDL and MDL cases against Debtors. | .50 | 115.00 |
| Shore, R. | 3/04/21 | Analyze common interest with MSGE re insurance issues. | 1.50 | 2,025.00 |
| Hudson, J. | 3/04/21 | Review common interest issues with MSGE re insurance. | .20 | 145.00 |
| Shore, R. | 3/05/21 | Analyze insurance recovery strategy and next steps. | .40 | 540.00 |

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| Name | Date | Services | Hours | Amount |
|---------------|---------|---|-------|--------|
| Hudson, J. | 3/05/21 | Continue review of insurance-related issues with MSGE. | .20 | 145.00 |
| Shore, R. | 3/07/21 | Continue review of common interest with MSGE re insurance issues. | .20 | 270.00 |
| Gilbert, S. | 3/08/21 | Confer with team re insurance issues. | .50 | 850.00 |
| Quinn, K. | 3/08/21 | Confer with team re status of case, strategy, and next steps. | .50 | 550.00 |
| Shore, R. | 3/08/21 | Analyze insurance recovery issues and strategy. | .30 | 405.00 |
| Shore, R. | 3/08/21 | Confer with S. Gilbert, D. Wolf, R. Leveridge, K. Quinn, J. Rubinstein, J. Hudson, S. Sraders, and A. Gaske re insurance recovery strategy. | .50 | 675.00 |
| Hudson, J. | 3/08/21 | Analyze next steps for insurance recovery. | .30 | 217.50 |
| Hudson, J. | 3/08/21 | Confer with bankruptcy and insurance teams re status. | .50 | 362.50 |
| Wolf, D. | 3/08/21 | Analyze insurance coverage issues. | .30 | 210.00 |
| Wolf, D. | 3/08/21 | Confer with S. Gilbert, R. Shore, R. Leveridge, K. Quinn, J. Rubinstein, J. Hudson, E. Grim, S. Sraders, and A. Gaske re insurance recovery strategy. | .50 | 350.00 |
| Gaske, A. | 3/08/21 | Confer with bankruptcy team (S. Gilbert, K. Quinn, S. Sraders) and insurance and litigation team (R. Shore, R. Leveridge, J. Hudson, J. Rubinstein, D. Wolf) re case update and strategy. | .50 | 250.00 |
| Leveridge, R. | 3/08/21 | Confer with team re insurance recovery status and strategy. | .50 | 700.00 |
| Sraders, S. | 3/08/21 | Confer with bankruptcy team (S. Gilbert, K. Quinn), litigation team (R. Leveridge, J. Rubinstein), and insurance team (R. Shore, J. Hudson, D. Wolf, A. Gaske) re current status of matters and next steps. | .30 | 172.50 |
| Shore, R. | 3/15/21 | Confer with bankruptcy, litigation, and insurance teams re current status and strategies moving forward. | .30 | 405.00 |
| Hudson, J. | 3/15/21 | Confer with bankruptcy and insurance teams re insurance strategy and status. | .30 | 217.50 |
| Rush, M. | 3/15/21 | Confer with team re case status and insurance strategy. | .30 | 202.50 |
| Gaske, A. | 3/15/21 | Confer with bankruptcy team (K. Quinn, S. Sraders) and insurance and litigation team (R. Leveridge, R. Shore, and J. Hudson) re insurance strategy. | .30 | 150.00 |
| Sraders, S. | 3/15/21 | Confer with bankruptcy (K. Quinn), litigation (R. Leveridge), and insurance (R. Shore, J. Hudson, A. Gaske) teams re current status and strategies moving forward. | .30 | 172.50 |

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May 25, 2021

| Name | Date | Services | Hours | Amount |
|-----------------------|---------|--|--------------|---------------------|
| Gilbert, S. | 3/24/21 | Confer with Debtors re insurance issues. | 1.00 | 1,700.00 |
| Hudson, J. | 3/26/21 | Analyze potential scope and timing of insurance recovery. | .30 | 217.50 |
| Hudson, J. | 3/29/21 | Communicate with bankruptcy team re insurance recovery strategy. | .10 | 72.50 |
| Johnson, K. | 3/29/21 | Revise tracking spreadsheets to reflect current insurer counsel contact information. | 2.30 | 529.00 |
| Gaske, A. | 3/29/21 | Communicate with bankruptcy team re insurance recovery strategy. | .20 | 100.00 |
| Gaske, A. | 3/29/21 | Update insurer contacts. | .20 | 100.00 |
| Johnson, K. | 3/30/21 | Finalize revision of tracking spreadsheets to reflect current insurer counsel contact information. | 1.60 | 368.00 |
| Project Total: | | | 19.90 | \$ 16,764.50 |

A004: Case Administration

| Name | Date | Services | Hours | Amount |
|-----------------------|---------|--|--------------|---------------------|
| Gilbert, S. | 3/02/21 | Meet with K. Feinberg re open issues in mediation. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/02/21 | Confer with TPPs re open mediation issues. | .50 | 850.00 |
| Quinn, K. | 3/04/21 | Participate in call with Debtors' counsel re R&D issues. | 1.00 | 1,100.00 |
| Gilbert, S. | 3/10/21 | Confer with D. Nachman re open issues in mediation. | .50 | 850.00 |
| Gilbert, S. | 3/10/21 | Attend TPPs mediation. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/10/21 | Confer with T. Sobol re mediation issues. | .50 | 850.00 |
| Gilbert, S. | 3/11/21 | Review materials and analyze issues re outstanding mediation issues. | 1.50 | 2,550.00 |
| Gilbert, S. | 3/12/21 | Confer with AHC counsel re TPPs abatement. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/12/21 | Confer with hospitals re abatement. | .50 | 850.00 |
| Gilbert, S. | 3/16/21 | Confer with schools re allocation. | .40 | 680.00 |
| Gilbert, S. | 3/17/21 | Confer with schools re allocation. | .50 | 850.00 |
| Gilbert, S. | 3/18/21 | Confer with D. Molton re outstanding allocation issues. | .50 | 850.00 |
| Gilbert, S. | 3/25/21 | Confer with AHC counsel re tribal deal. | .50 | 850.00 |
| Gilbert, S. | 3/25/21 | Confer with hospitals re abatement. | .50 | 850.00 |
| Gilbert, S. | 3/26/21 | Confer with mediator re privates. | .50 | 850.00 |
| Sraders, S. | 3/26/21 | Confer with U. Khan and G. Cicero re payment for F. Hyde. | .70 | 402.50 |
| Project Total: | | | 11.10 | \$ 17,482.50 |

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May 25, 2021

A006: Employment / Fee Applications

| Name | Date | Services | Hours | Amount |
|-----------------------|-------------|--|--------------|--------------------|
| Holland, P. | 3/03/21 | Begin drafting fourth interim application. | 1.90 | 551.00 |
| Grim, E. | 3/05/21 | Revise January fee application. | 1.30 | 910.00 |
| Holland, P. | 3/07/21 | Draft January 2021 fee statement. | 1.10 | 319.00 |
| Holland, P. | 3/10/21 | Continue drafting interim fee application. | 2.30 | 667.00 |
| Grim, E. | 3/16/21 | Revise fourth interim fee application. | .20 | 140.00 |
| Holland, P. | 3/17/21 | Finalize January fee statement (0.5); communicate with US Trustee and Fee Examiner re January fee statement and LEDES file for same (0.1). | .60 | 174.00 |
| Holland, P. | 3/17/21 | Finalize 4th interim fee application. | .80 | 232.00 |
| Project Total: | | | 8.20 | \$ 2,993.00 |

A009: Meetings / Communications with AHC & Creditors

| Name | Date | Services | Hours | Amount |
|-------------|-------------|--|--------------|---------------|
| Gilbert, S. | 3/02/21 | Confer with AHC re open mediation issues. | .50 | 850.00 |
| Gilbert, S. | 3/03/21 | Confer with AHC and counsel re plan issues. | 1.70 | 2,890.00 |
| Quinn, K. | 3/03/21 | Participate in client call re status and strategy of negotiations. | 1.70 | 1,870.00 |
| Grim, E. | 3/03/21 | Confer with AHC re Sackler issues and plan negotiation. | 1.70 | 1,190.00 |
| Sraders, S. | 3/03/21 | Confer with AHC re negotiations with Sacklers, term sheets, and terms of plan. | 1.70 | 977.50 |
| Gilbert, S. | 3/04/21 | Confer with AHC re status of negotiations with Sacklers and private creditors. | .50 | 850.00 |
| Gilbert, S. | 3/09/21 | Meet with AHC working group re plan issues. | 4.00 | 6,800.00 |
| Gilbert, S. | 3/10/21 | Confer with J. Conroy re PEC perspective of mediation issues. | .50 | 850.00 |
| Gilbert, S. | 3/10/21 | Confer with J. Rice and J. Conroy re plan. | .50 | 850.00 |
| Gilbert, S. | 3/10/21 | Meet with AHC re strategy for plan negotiations. | 3.00 | 5,100.00 |
| Hudson, J. | 3/10/21 | Confer with Ad Hoc Committee (J. Peacock) re insurance-related implications of draft plan. | .30 | 217.50 |
| Grim, E. | 3/10/21 | Confer with AHC re plan revisions and other updates. | 1.00 | 700.00 |
| Sraders, S. | 3/10/21 | Confer with Ad Hoc Committee re status of plan negotiations and next steps. | 1.00 | 575.00 |
| Quinn, K. | 3/15/21 | Participate in call with AHC re next steps in plan negotiations (partial). | .80 | 880.00 |

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| Name | Date | Services | Hours | Amount |
|-------------|---------|--|-------|----------|
| Hudson, J. | 3/15/21 | Confer with Ad Hoc Committee re status of plan drafts and negotiations. | 3.20 | 2,320.00 |
| Grim, E. | 3/15/21 | Confer with AHC re open issues in plan. | 3.20 | 2,240.00 |
| Hudson, J. | 3/17/21 | Confer with Ad Hoc Committee re plan insurance issues. | 1.40 | 1,015.00 |
| Grim, E. | 3/17/21 | Confer with AHC re plan negotiations, | 1.40 | 980.00 |
| Wolf, D. | 3/17/21 | Confer with AHC and Kramer Levin re bankruptcy plan status and revisions. | 1.40 | 980.00 |
| Sraders, S. | 3/17/21 | Confer with Ad Hoc Committee re plan filing, open issues, and next steps. | 1.40 | 805.00 |
| Gilbert, S. | 3/18/21 | Confer with AHC re plan. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/19/21 | Confer with AHC re plan. | .50 | 850.00 |
| Gilbert, S. | 3/20/21 | Confer with J. Rice re mediation update. | .50 | 850.00 |
| Gilbert, S. | 3/22/21 | Confer with J. Rice re plan third-party releases. | .50 | 850.00 |
| Gilbert, S. | 3/23/21 | Confer with AHC re status of Sackler and plan negotiations. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/23/21 | Attend non-state AHC briefing. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/23/21 | Confer with AHC reps re next steps in mediation. | .50 | 850.00 |
| Sraders, S. | 3/23/21 | Confer with non-state members of the Ad Hoc Committee re status of plan documents and attorney fee negotiations. | .40 | 230.00 |
| Gilbert, S. | 3/24/21 | Confer with AHC working group re plan issues. | 1.50 | 2,550.00 |
| Grim, E. | 3/24/21 | Confer with AHC re updates on plan revisions. | 1.50 | 1,050.00 |
| Sraders, S. | 3/24/21 | Confer with AHC, Kramer Levin, and S. Gilbert re outstanding issues in plan. | 1.50 | 862.50 |
| Gilbert, S. | 3/25/21 | Confer with AHC re IAC financial analysis. | .80 | 1,360.00 |
| Gilbert, S. | 3/25/21 | Confer with AHC working group re plan. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/25/21 | Correspond with AHC working group re plan issues. | .70 | 1,190.00 |
| Sraders, S. | 3/25/21 | Confer with AHC and S. Gilbert re financial scenarios based on IAC sales. | .80 | 460.00 |
| Gilbert, S. | 3/29/21 | Confer with AHC re plan. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/30/21 | Confer with AHC working group re open issues in plan negotiations. | 2.00 | 3,400.00 |
| Gilbert, S. | 3/30/21 | Confer with AHC and MSGE re plan (1.2); correspond with AHC working group re same (0.8). | 2.00 | 3,400.00 |
| Gilbert, S. | 3/31/21 | Confer with AHC working group re open issues in private creditor negotiations. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/31/21 | Attend AHC meeting re plan status and insurance issues. | 1.00 | 1,700.00 |
| Hudson, J. | 3/31/21 | Attend Ad Hoc Committee meeting re insurance issues. | 1.00 | 725.00 |

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May 25, 2021

| Name | Date | Services | Hours | Amount |
|-----------------------|---------|--|--------------|---------------------|
| Grim, E. | 3/31/21 | Confer with AHC re plan status and other issues. | 1.00 | 700.00 |
| Sraders, S. | 3/31/21 | Confer with AHC re status of Sackler agreement, abatement term sheet, attorney fees, and plan of reorganization. | 1.00 | 575.00 |
| Project Total: | | | 54.10 | \$ 64,742.50 |

A019: Plan of Reorganization / Disclosure Statement

| Name | Date | Services | Hours | Amount |
|-------------|---------|--|-------|----------|
| Gilbert, S. | 3/01/21 | Attend hearing re exclusivity. | .60 | 1,020.00 |
| Quinn, K. | 3/01/21 | Participate in hearing re exclusivity. | .60 | 660.00 |
| Quinn, K. | 3/01/21 | Confer with insurance team re carve-out to released parties. | .70 | 770.00 |
| Shore, R. | 3/01/21 | Analyze treatment of excluded parties and insurance rights under the plan. | 3.20 | 4,320.00 |
| Hudson, J. | 3/01/21 | Analyze options for treatment of additional insureds under plan. | 2.60 | 1,885.00 |
| Hudson, J. | 3/01/21 | Analyze scope of additional insureds under relevant policies in connection with plan drafting process. | 3.70 | 2,682.50 |
| Grim, E. | 3/01/21 | Review research and plan examples relevant to release issues. | 1.70 | 1,190.00 |
| Grim, E. | 3/01/21 | Revise plan provisions re creditor settlements. | .80 | 560.00 |
| Grim, E. | 3/01/21 | Analyze plan release issues. | .70 | 490.00 |
| Rush, M. | 3/01/21 | Confer with J. Hudson, S. Sraders, R. Shore, E. Grim, and K. Quinn re release issue. | .70 | 472.50 |
| Sraders, S. | 3/01/21 | Initial review of treatment of excluded parties and insurance rights under the plan. | .70 | 402.50 |
| Sraders, S. | 3/01/21 | Research re plan release issues. | 4.90 | 2,817.50 |
| Sraders, S. | 3/01/21 | Review language in other plans re plan release issues. | 3.80 | 2,185.00 |
| Gilbert, S. | 3/02/21 | Confer with Debtors re contribution agreement. | 1.00 | 1,700.00 |
| Quinn, K. | 3/02/21 | Revise correspondence re excluded parties issue. | .40 | 440.00 |
| Quinn, K. | 3/02/21 | Participate in call with Debtors' counsel re credit issues. | 1.50 | 1,650.00 |
| Quinn, K. | 3/02/21 | Analyze impact of plan on insurance accessibility. | 1.00 | 1,100.00 |
| Hudson, J. | 3/02/21 | Review analysis of options for treatment of additional insureds under plan. | .80 | 580.00 |
| Grim, E. | 3/02/21 | Research plan release issue. | .80 | 560.00 |
| Grim, E. | 3/02/21 | Analyze insurance impact of certain plan provisions. | 2.30 | 1,610.00 |

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|-------------|---------|---|-------|----------|
| Grim, E. | 3/02/21 | Draft outline re insurance impact of certain plan provisions. | .50 | 350.00 |
| Wolf, D. | 3/02/21 | Review draft plan provisions re insurance rights. | 1.20 | 840.00 |
| Sraders, S. | 3/02/21 | Research re settlements under policies involving additional insureds. | 9.20 | 5,290.00 |
| Gilbert, S. | 3/03/21 | Confer with co-counsel re plan negotiation strategy. | 1.50 | 2,550.00 |
| Gilbert, S. | 3/03/21 | Confer with Debtors re contribution agreement. | 1.00 | 1,700.00 |
| Quinn, K. | 3/03/21 | Review contribution agreement scenarios. | .30 | 330.00 |
| Quinn, K. | 3/03/21 | Communicate with team re injunctive protection of insurance policies. | .20 | 220.00 |
| Quinn, K. | 3/03/21 | Participate in call with Debtors re contribution agreement. | 1.00 | 1,100.00 |
| Grim, E. | 3/03/21 | Review research re plan release issue. | .40 | 280.00 |
| Sraders, S. | 3/03/21 | Analyze language relating to insurer injunctions in asbestos plans. | 1.60 | 920.00 |
| Sraders, S. | 3/03/21 | Research re insurance settlements in bankruptcy. | .90 | 517.50 |
| Gilbert, S. | 3/04/21 | Confer with S. Birnbaum re plan. | .50 | 850.00 |
| Gilbert, S. | 3/04/21 | Confer with Debtors re plan. | 1.00 | 1,700.00 |
| Shore, R. | 3/04/21 | Confer with K. Quinn re TDP (0.9); analyze injunction issue (1.4). | 2.50 | 3,375.00 |
| Hudson, J. | 3/04/21 | Analyze current draft of plan and trust distribution procedures to identify insurance-related considerations. | 1.20 | 870.00 |
| Hudson, J. | 3/04/21 | Analyze potential approaches to additional insureds in plan and interaction with insurance recovery efforts. | .70 | 507.50 |
| Sraders, S. | 3/04/21 | Review memorandum re sale of insurance assets. | .70 | 402.50 |
| Gilbert, S. | 3/05/21 | Confer with Debtors and AHC re plan. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/05/21 | Confer with Debtors re plan and co-defendant claims. | 2.00 | 3,400.00 |
| Gilbert, S. | 3/05/21 | Confer with M. Kesselman and S. Birnbaum re plan. | .50 | 850.00 |
| Shore, R. | 3/05/21 | Review trust distribution procedures documents. | .10 | 135.00 |
| Hudson, J. | 3/05/21 | Communicate with R. Shore re review of TDP-related materials. | .10 | 72.50 |
| Gaske, A. | 3/05/21 | Analyze status of common interest agreements. | 1.30 | 650.00 |
| Grim, E. | 3/06/21 | Review Debtors' edits to plan. | .30 | 210.00 |
| Hudson, J. | 3/07/21 | Analyze current draft of plan and TDP to identify insurance-related considerations. | 2.70 | 1,957.50 |
| Gilbert, S. | 3/08/21 | Confer with AHC working group and Debtors re plan (2.4); revise same (2.1). | 4.50 | 7,650.00 |

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|-------------|---------|--|-------|-----------|
| Hudson, J. | 3/08/21 | Analyze interaction of plan and Insurance Issue #43. | .50 | 362.50 |
| Hudson, J. | 3/08/21 | Continue analysis of the current draft of plan and TDP to identify insurance-related considerations. | 2.80 | 2,030.00 |
| Hudson, J. | 3/08/21 | Analyze impact of current draft of excluded parties list on insurance strategy. | .10 | 72.50 |
| Grim, E. | 3/08/21 | Review revised plan. | .90 | 630.00 |
| Wolf, D. | 3/08/21 | Review plan provisions re D&O insurance coverage considerations. | 3.20 | 2,240.00 |
| Sraders, S. | 3/08/21 | Analyze bankruptcy rules re timing of plan confirmation and objections. | .40 | 230.00 |
| Gilbert, S. | 3/09/21 | Confer with AHC working group re all open plan issues, strategy for plan negotiations, and plan revisions. | 7.00 | 11,900.00 |
| Quinn, K. | 3/09/21 | Analyze insurance team comments to plan. | 2.30 | 2,530.00 |
| Hudson, J. | 3/09/21 | Analyze insurance implications of current draft of plan. | 5.00 | 3,625.00 |
| Hudson, J. | 3/09/21 | Analyze insurance implications of current draft of TDP. | .70 | 507.50 |
| Grim, E. | 3/09/21 | Review new insurance-related edits to revised plan. | .20 | 140.00 |
| Wolf, D. | 3/09/21 | Review plan provisions re D&O insurance coverage considerations. | 1.00 | 700.00 |
| Sraders, S. | 3/09/21 | Review settlement documents referenced in plan. | .30 | 172.50 |
| Gilbert, S. | 3/10/21 | Confer with S. Birnbaum re plan issues. | .50 | 850.00 |
| Gilbert, S. | 3/10/21 | Confer with Debtors re contribution agreement. | 1.00 | 1,700.00 |
| Quinn, K. | 3/10/21 | Confer with team re revisions to plan documents. | 1.20 | 1,320.00 |
| Shore, R. | 3/10/21 | Review and comment on plan provisions re D&O insurance coverage considerations. | .50 | 675.00 |
| Shore, R. | 3/10/21 | Analyze impact on insurance of excluded parties, plan revisions. | 1.20 | 1,620.00 |
| Hudson, J. | 3/10/21 | Confer with UCC (A. Preis, M. Hurley) re proposed list of excluded parties to evaluate insurance impact. | .20 | 145.00 |
| Hudson, J. | 3/10/21 | Analyze insurance implications of current draft of plan. | .90 | 652.50 |
| Grim, E. | 3/10/21 | Review revised plan for insurance-related issues. | .80 | 560.00 |
| Grim, E. | 3/10/21 | Confer with S. Gilbert and S. Sraders re research on plan-related issue. | .50 | 350.00 |
| Wolf, D. | 3/10/21 | Review plan provisions re D&O insurance coverage considerations. | 1.90 | 1,330.00 |
| Wolf, D. | 3/10/21 | Confer with UCC (A. Preis, M. Hurley) and J. Hudson re bankruptcy plan provisions. | .20 | 140.00 |

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|----------------|---------|--|-------|----------|
| Wolf, D. | 3/10/21 | Summarize status of plan provisions re D&O insurance coverage considerations. | .30 | 210.00 |
| Sraders, S. | 3/10/21 | Confer with S. Gilbert and E. Grim re third-party plan issues. | .30 | 172.50 |
| Sraders, S. | 3/10/21 | Communicate with K. Quinn re private creditor settlements. | .20 | 115.00 |
| Gilbert, S. | 3/11/21 | Confer with Houlihan Lokey re plan. | .50 | 850.00 |
| Gilbert, S. | 3/11/21 | Confer with K. Maclay re plan. | .50 | 850.00 |
| Gilbert, S. | 3/11/21 | Confer with Debtors re plan issues. | 1.50 | 2,550.00 |
| Quinn, K. | 3/11/21 | Confer with R. Shore and J. Hudson re plan revisions. | .40 | 440.00 |
| Shore, R. | 3/11/21 | Confer with K. Quinn and J. Hudson re plan revisions. | .40 | 540.00 |
| Shore, R. | 3/11/21 | Analyze insurance issues re draft plan. | 1.60 | 2,160.00 |
| Shore, R. | 3/11/21 | Review and comment on plan insurance provisions. | 1.50 | 2,025.00 |
| Hudson, J. | 3/11/21 | Confer with K. Quinn and R. Shore re revisions to plan. | .40 | 290.00 |
| Hudson, J. | 3/11/21 | Analyze insurance implications of current draft of plan with respect to Insurance Issue #43. | .20 | 145.00 |
| Hudson, J. | 3/11/21 | Analyze insurance implications of current draft of disclosure statement. | .10 | 72.50 |
| Hudson, J. | 3/11/21 | Analyze interaction of TDP draft and insurance recovery strategy. | 1.60 | 1,160.00 |
| Grim, E. | 3/11/21 | Review updated plan. | .40 | 280.00 |
| Wolf, D. | 3/11/21 | Review plan provisions and proposed revisions re D&O insurance coverage considerations. | .40 | 280.00 |
| Gilbert, S. | 3/12/21 | Confer with Debtors re releases. | .50 | 850.00 |
| Gilbert, S. | 3/12/21 | Confer with Houlihan Lokey re plan. | .50 | 850.00 |
| Gilbert, S. | 3/12/21 | Confer with Debtors and Sackler counsel re Sacklers side B. | 1.00 | 1,700.00 |
| Quinn, K. | 3/12/21 | Confer with team re plan provisions impact on insurance recovery efforts. | 1.10 | 1,210.00 |
| Shore, R. | 3/12/21 | Review revisions to plan re insurance coverage. | 2.00 | 2,700.00 |
| Hudson, J. | 3/12/21 | Analyze insurance implications of current draft of plan. | 1.80 | 1,305.00 |
| Hudson, J. | 3/12/21 | Confer with team re plan-related insurance issues. | 1.10 | 797.50 |
| Hudson, J. | 3/12/21 | Confer with Debtors (A. Kramer) re insurance implications of current draft of plan. | .10 | 72.50 |
| Grim, E. | 3/12/21 | Review current version of plan. | 3.50 | 2,450.00 |
| Rubinstein, J. | 3/12/21 | Confer with team re plan provisions re insurance. | 1.10 | 880.00 |

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|---------------|---------|---|-------|----------|
| Wolf, D. | 3/12/21 | Review bankruptcy plan provisions re D&O insurance coverage. | 5.60 | 3,920.00 |
| Rush, M. | 3/12/21 | Confer with team re plan / insurance-related issues. | 1.00 | 675.00 |
| Gaske, A. | 3/12/21 | Analyze case strategy and updates to plan. | 1.20 | 600.00 |
| Leveridge, R. | 3/12/21 | Confer with team re insurance-related plan issues. | 1.10 | 1,540.00 |
| Sraders, S. | 3/12/21 | Review plan considerations re insurance. | 1.10 | 632.50 |
| Gilbert, S. | 3/13/21 | Confer with Houlihan Lokey re plan. | .50 | 850.00 |
| Gilbert, S. | 3/13/21 | Confer with co-counsel re plan (1.1); confer with Debtors re same (0.9). | 2.00 | 3,400.00 |
| Quinn, K. | 3/13/21 | Participate in call with AHC professionals re plan edits. | 1.50 | 1,650.00 |
| Quinn, K. | 3/13/21 | Review proposed plan language re release of claims and other plan language. | .70 | 770.00 |
| Hudson, J. | 3/13/21 | Analyze insurance implications of current draft of plan. | 2.60 | 1,885.00 |
| Hudson, J. | 3/13/21 | Confer with AHC and co-counsel re current draft of plan. | 1.40 | 1,015.00 |
| Grim, E. | 3/13/21 | Review Debtors' next round of revisions to plan. | 2.50 | 1,750.00 |
| Grim, E. | 3/13/21 | Confer with AHC mediation subgroup re revisions to plan. | 1.60 | 1,120.00 |
| Wolf, D. | 3/13/21 | Review bankruptcy plan provisions re D&O insurance coverage. | 2.50 | 1,750.00 |
| Wolf, D. | 3/13/21 | Confer with AHC professionals (R. Ringer, J. Peacock, P. Singer, S. Gilbert, K. Quinn, J. Hudson, E. Grim) re bankruptcy plan provisions. | 1.60 | 1,120.00 |
| Gilbert, S. | 3/14/21 | Confer with Debtors re plan. | 3.50 | 5,950.00 |
| Quinn, K. | 3/14/21 | Participate in call with Debtors re insurance -related plan terms. | .80 | 880.00 |
| Quinn, K. | 3/14/21 | Communicate with team re insurance-related plan terms. | .20 | 220.00 |
| Quinn, K. | 3/14/21 | Participate in call with Debtors and plan drafting group re plan terms. | 3.50 | 3,850.00 |
| Quinn, K. | 3/14/21 | Participate in call with co-counsel and advisors re governance term sheet. | 1.20 | 1,320.00 |
| Shore, R. | 3/14/21 | Confer with Debtors re plan insurance provisions (3.5); analyze same (1.5). | 5.00 | 6,750.00 |
| Hudson, J. | 3/14/21 | Confer with Debtors (R. Aleali, S. Birnbaum, A. Kramer, Z. Levine, P. Breene, S. Massman, M. Venditto, and E. Vonnegut) re insurance implications of current draft of plan. | 1.00 | 725.00 |
| Hudson, J. | 3/14/21 | Revise plan provisions bearing on insurance. | .70 | 507.50 |

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|-------------|---------|--|-------|----------|
| Hudson, J. | 3/14/21 | Attend portion of call with Debtors and AHC re latest round of revisions and finalizing plan for filing tomorrow. | 1.50 | 1,087.50 |
| Grim, E. | 3/14/21 | Confer with Debtors and AHC re broader revisions to plan (partial). | 1.00 | 700.00 |
| Grim, E. | 3/14/21 | Confer with Debtors re insurance revisions to plan. | .90 | 630.00 |
| Grim, E. | 3/14/21 | Revise insurance-related provisions of plan based on conferences with Debtors. | 1.10 | 770.00 |
| Wolf, D. | 3/14/21 | Confer with Debtors and AHC professionals (A. Kramer, R. Ringer, E. Vonnegut, K. Quinn, J. Hudson, E. Grim) re bankruptcy plan provisions. | .90 | 630.00 |
| Wolf, D. | 3/14/21 | Confer with Debtors and AHC professionals (R. Ringer, E. Vonnegut, S. Birnbaum, M. Huebner, K. Eckstein, S. Gilbert, K. Quinn, J. Hudson) re bankruptcy plan provisions. | 3.50 | 2,450.00 |
| Wolf, D. | 3/14/21 | Review bankruptcy plan provisions re D&O insurance coverage. | 1.20 | 840.00 |
| Gilbert, S. | 3/15/21 | Confer with co-counsel re plan. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/15/21 | Confer with S. Birnbaum re open plan issues. | .50 | 850.00 |
| Gilbert, S. | 3/15/21 | Review and analyze plan materials. | 2.00 | 3,400.00 |
| Gilbert, S. | 3/15/21 | Correspond with AHC working group re plan (1.9); review newest version of plan (2.1). | 4.00 | 6,800.00 |
| Quinn, K. | 3/15/21 | Confer with team re coordination between insurance and bankruptcy teams. | .30 | 330.00 |
| Quinn, K. | 3/15/21 | Confer with co-counsel re status of plan negotiations. | .50 | 550.00 |
| Quinn, K. | 3/15/21 | Correspond with Debtors re plan changes. | .30 | 330.00 |
| Quinn, K. | 3/15/21 | Various calls with co-counsel (Kramer Levin) re revisions to plan documents. | 2.20 | 2,420.00 |
| Quinn, K. | 3/15/21 | Correspond with AHC re ongoing plan revisions. | 1.20 | 1,320.00 |
| Shore, R. | 3/15/21 | Analyze and address plan issues re insurance. | 3.00 | 4,050.00 |
| Hudson, J. | 3/15/21 | Analyze insurance-related considerations stemming from current draft of disclosure statement. | .20 | 145.00 |
| Hudson, J. | 3/15/21 | Analyze insurance-related considerations stemming from current draft of plan. | .50 | 362.50 |
| Hudson, J. | 3/15/21 | Analyze insurance aspects of current draft of plan. | 1.10 | 797.50 |
| Grim, E. | 3/15/21 | Revise insurance-related plan issues in new draft. | 2.40 | 1,680.00 |
| Grim, E. | 3/15/21 | Review disclosure statement. | .30 | 210.00 |
| Wolf, D. | 3/15/21 | Review bankruptcy plan provisions re D&O insurance coverage. | 2.80 | 1,960.00 |
| Quinn, K. | 3/16/21 | Confirm plan filing and edits. | .50 | 550.00 |

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| Hudson, J. | 3/16/21 | Continue to analyze insurance implications of current draft of plan and related documents. | .10 | 72.50 |
| Gilbert, S. | 3/17/21 | Confer with K. Maclay re open issues in plan negotiations. | .50 | 850.00 |
| Gilbert, S. | 3/17/21 | Confer with S. Birnbaum re various plan-related issues. | .50 | 850.00 |
| Gilbert, S. | 3/17/21 | Confer with insurance team re plan revisions. | 1.60 | 2,720.00 |
| Quinn, K. | 3/17/21 | Confer with insurance team re next steps on plan revisions | 1.60 | 1,760.00 |
| Quinn, K. | 3/17/21 | Confer with insurance team re plan insurance issues. | .50 | 550.00 |
| Shore, R. | 3/17/21 | Confer with D. Wolf, K. Quinn, J. Hudson, and E. Grim re bankruptcy plan provisions re insurance coverage. | .50 | 675.00 |
| Shore, R. | 3/17/21 | Confer with S. Gilbert, D. Wolf, K. Quinn, J. Hudson, and E. Grim re bankruptcy plan provisions re insurance coverage. | 1.60 | 2,160.00 |
| Hudson, J. | 3/17/21 | Confer with bankruptcy and insurance teams re next steps for insurance-related provisions of plan and disclosure statement. | 1.60 | 1,160.00 |
| Grim, E. | 3/17/21 | Confer with insurance team re next step in plan negotiations. | .50 | 350.00 |
| Grim, E. | 3/17/21 | Confer with insurance team and S. Gilbert re plan treatment of D&O insurance and other issues. | 1.60 | 1,120.00 |
| Grim, E. | 3/17/21 | Review revisions to plan. | .60 | 420.00 |
| Grim, E. | 3/17/21 | Research issues re plan's treatment of third parties. | .80 | 560.00 |
| Wolf, D. | 3/17/21 | Confer with R. Shore, K. Quinn, J. Hudson, and E. Grim re bankruptcy plan provisions re insurance coverage. | .50 | 350.00 |
| Wolf, D. | 3/17/21 | Review plan and disclosure statement re D&O insurance coverage issues. | .60 | 420.00 |
| Wolf, D. | 3/17/21 | Confer with S. Gilbert, R. Shore, K. Quinn, J. Hudson, and E. Grim re bankruptcy plan provisions re insurance coverage. | 1.60 | 1,120.00 |
| Sraders, S. | 3/17/21 | Review proposed plan language from distributors. | .20 | 115.00 |
| Gilbert, S. | 3/18/21 | Confer with K. Maclay re insurance-related plan issues. | .50 | 850.00 |
| Quinn, K. | 3/18/21 | Review Debtors' proposed dates and schedule. | .20 | 220.00 |
| Grim, E. | 3/18/21 | Review Debtors' proposed confirmation schedule. | .10 | 70.00 |
| Grim, E. | 3/18/21 | Research issues relevant to co-defendant issues in plan. | .20 | 140.00 |

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| Wolf, D. | 3/18/21 | Review plan and disclosure statement re D&O insurance coverage issues. | .20 | 140.00 |
| Johnson, K. | 3/18/21 | Research third parties impacted by plan. | .80 | 184.00 |
| Ogrey, S. | 3/18/21 | Research non-debtor entities impacted by plan. | .70 | 161.00 |
| Sraders, S. | 3/18/21 | Review plan treatment of indemnity claims. | .20 | 115.00 |
| Gilbert, S. | 3/19/21 | Confer with R. Ringer re plan. | .30 | 510.00 |
| Gilbert, S. | 3/19/21 | Confer with Davis Polk (Debtors' counsel) re plan. | .50 | 850.00 |
| Gilbert, S. | 3/19/21 | Confer with Debtors re plan. | 1.00 | 1,700.00 |
| Quinn, K. | 3/19/21 | Communicate with team re plan confirmation schedule and strategy. | .30 | 330.00 |
| Hudson, J. | 3/19/21 | Confer with Debtors, UCC, and AHC representatives re release-related issues in plan documents with respect to insurance issues. | 1.50 | 1,087.50 |
| Hudson, J. | 3/19/21 | Review Debtors' proposal for finalizing plan-related documentation in advance of disclosure statement hearing. | .20 | 145.00 |
| Hudson, J. | 3/19/21 | Confer with Debtors, Sacklers, UCC, and AHC re plan documents with respect to insurance issues. | .50 | 362.50 |
| Grim, E. | 3/19/21 | Review communications re plan revisions. | .20 | 140.00 |
| Grim, E. | 3/19/21 | Confer with counsel for creditors, Debtors, and Sacklers re scope of releases. | 1.50 | 1,050.00 |
| Grim, E. | 3/19/21 | Confer with counsel for creditors, Debtors, and Sacklers re plan revisions. | .50 | 350.00 |
| Grim, E. | 3/19/21 | Review amended plan. | .50 | 350.00 |
| Wolf, D. | 3/19/21 | Review plan supplemental documents re D&O insurance coverage issues. | .60 | 420.00 |
| Wolf, D. | 3/19/21 | Confer with Debtors' counsel, AHC counsel, and MSGE counsel re revisions to plan supplement documents. | 1.50 | 1,050.00 |
| Wolf, D. | 3/19/21 | Confer with Sacklers' counsel, Debtors' counsel, AHC counsel, and MSGE counsel re revisions to plan supplement documents. | .50 | 350.00 |
| Ogrey, S. | 3/19/21 | Continue researching third party entities impacted by plan. | 2.20 | 506.00 |
| Sraders, S. | 3/19/21 | Telephone conference with Debtors, AHC, and UCC re Sackler term sheet. | 1.50 | 862.50 |
| Hudson, J. | 3/20/21 | Review insurance considerations for finalizing Sackler settlement documents. | .10 | 72.50 |
| Hudson, J. | 3/21/21 | Analyze insurance implications of current draft plan and disclosure statement. | .10 | 72.50 |

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| Hudson, J. | 3/21/21 | Review issues in preparation for upcoming discussions re finalizing plan and related documentation. | .10 | 72.50 |
| Gilbert, S. | 3/22/21 | Confer with AHC counsel re plan. | 1.00 | 1,700.00 |
| Gilbert, S. | 3/22/21 | Review and analyze plan materials. | 2.00 | 3,400.00 |
| Hudson, J. | 3/22/21 | Analyze insurance implications of current draft plan and disclosure statement. | .20 | 145.00 |
| Grim, E. | 3/22/21 | Research issue relating to third parties. | .30 | 210.00 |
| Ogrey, S. | 3/22/21 | Continue research re third parties impacted by plan. | 1.10 | 253.00 |
| Sraders, S. | 3/22/21 | Summarize findings re third-party plan issues. | 1.00 | 575.00 |
| Sraders, S. | 3/22/21 | Review public materials re third parties impacted by plan. | 1.00 | 575.00 |
| Quinn, K. | 3/23/21 | Analyze plan valuation issues and status of negotiations. | 1.30 | 1,430.00 |
| Quinn, K. | 3/23/21 | Communicate with Debtors re next steps. | .20 | 220.00 |
| Shore, R. | 3/23/21 | Review plan documents re insurance coverage. | 1.00 | 1,350.00 |
| Hudson, J. | 3/23/21 | Analyze insurance implications of current draft plan and related documents, including strategy leading up to proposed confirmation hearing (4.7); confer with team re plan insurance issues (1.0). | 5.70 | 4,132.50 |
| Grim, E. | 3/23/21 | Revise plan and related documents to address insurance-related issues. | .60 | 420.00 |
| Grim, E. | 3/23/21 | Review revisions to plan and related documents. | 1.00 | 700.00 |
| Wolf, D. | 3/23/21 | Review revised plan supplemental documents re D&O insurance coverage issues. | 3.10 | 2,170.00 |
| Gilbert, S. | 3/24/21 | Analyze revised plan language re insurance. | 1.20 | 2,040.00 |
| Quinn, K. | 3/24/21 | Review insurance-related plan revisions. | 1.20 | 1,320.00 |
| Shore, R. | 3/24/21 | Confer with team re plan negotiations. | 1.20 | 1,620.00 |
| Shore, R. | 3/24/21 | Prepare for and participate call with Debtors re plan issues. | 1.50 | 2,025.00 |
| Hudson, J. | 3/24/21 | Analyze outstanding insurance-related items for plan and related documents. | 2.00 | 1,450.00 |
| Hudson, J. | 3/24/21 | Confer with Debtors (Reed Smith, Dechert, and Davis Polk) re outstanding insurance-related items for plan and related documents. | 1.00 | 725.00 |
| Hudson, J. | 3/24/21 | Follow-up conference with Debtors (Reed Smith, Dechert, and Davis Polk) re outstanding insurance-related items for plan and related documents. | .30 | 217.50 |
| Grim, E. | 3/24/21 | Confer with Debtors' counsel and UCC re Sackler agreement. | .70 | 490.00 |
| Grim, E. | 3/24/21 | Confer with S. Sraders and R. Leveridge re issues relating to co-defendant claims. | .30 | 210.00 |

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|---------------|---------|---|-------|----------|
| Grim, E. | 3/24/21 | Review Debtors' responses to proposals on insurance-related plan edits. | 1.40 | 980.00 |
| Wolf, D. | 3/24/21 | Review current version of plan documents re insurance. | 1.20 | 840.00 |
| Leveridge, R. | 3/24/21 | Confer with E. Grim and S. Sraders re issues relating to co-defendant claims (0.3); communicate with A. Farra re same (0.3). | .60 | 840.00 |
| Sraders, S. | 3/24/21 | Review outstanding issues in plan and next steps. | 1.20 | 690.00 |
| Sraders, S. | 3/24/21 | Confer with R. Leveridge and E. Grim re analysis of co-defendant issues. | .30 | 172.50 |
| Gilbert, S. | 3/25/21 | Confer with S. Birnbaum re open plan issues. | .50 | 850.00 |
| Quinn, K. | 3/25/21 | Communicate with J. Hudson re plan liability language. | .20 | 220.00 |
| Shore, R. | 3/25/21 | Analyze insurance coverage considerations in plan documents. | 1.50 | 2,025.00 |
| Hudson, J. | 3/25/21 | Continue to analyze insurance implications of current draft plan and related documents, including strategy leading up to proposed confirmation hearing. | 1.40 | 1,015.00 |
| Grim, E. | 3/25/21 | Analyze revisions to plan re insurance coverage. | 1.00 | 700.00 |
| Wolf, D. | 3/25/21 | Review plan supplement documents re evaluation of D&O insurance coverage. | 1.50 | 1,050.00 |
| Gilbert, S. | 3/26/21 | Confer with DOJ re plan. | 1.00 | 1,700.00 |
| Quinn, K. | 3/26/21 | Analyze plan insurance issues. | .80 | 880.00 |
| Quinn, K. | 3/26/21 | Participate in call with Debtors and insurance team re finalizing insurance issues. | 1.20 | 1,320.00 |
| Shore, R. | 3/26/21 | Review issues re drafting plan supplement documents. | .60 | 810.00 |
| Hudson, J. | 3/26/21 | Analyze approaches to D&O coverage under plan. | .80 | 580.00 |
| Wolf, D. | 3/26/21 | Review plan supplement documents re evaluation of D&O insurance coverage. | 2.10 | 1,470.00 |
| Gilbert, S. | 3/27/21 | Attend Sackler proposal meeting. | 1.00 | 1,700.00 |
| Hudson, J. | 3/27/21 | Revise portions of draft plan and related documents impacting insurance. | 1.30 | 942.50 |
| Wolf, D. | 3/27/21 | Revise plan documents re D&O insurance coverage rights. | 1.90 | 1,330.00 |
| Quinn, K. | 3/28/21 | Communicate with team re plan draft. | .20 | 220.00 |
| Hudson, J. | 3/28/21 | Revise portions of draft plan and related documents impacting insurance. | 3.60 | 2,610.00 |
| Grim, E. | 3/28/21 | Revise updated plan for insurance-related issues. | .30 | 210.00 |
| Wolf, D. | 3/28/21 | Revise plan documents re D&O insurance coverage rights. | 1.90 | 1,330.00 |

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| Name | Date | Services | Hours | Amount |
|-------------|---------|--|-------|----------|
| Sraders, S. | 3/28/21 | Review example plans for language re valuation. | 1.30 | 747.50 |
| Gilbert, S. | 3/29/21 | Confer with Debtors re plan. | 1.50 | 2,550.00 |
| Quinn, K. | 3/29/21 | Review and revise redline of plan provisions. | .80 | 880.00 |
| Hudson, J. | 3/29/21 | Confer with Debtors (partial) re status of Sackler agreement to monitor impact on insurance. | .40 | 290.00 |
| Hudson, J. | 3/29/21 | Communicate with Debtors re redlines to plan concerning open issue issues. | .20 | 145.00 |
| Hudson, J. | 3/29/21 | Revise portions of draft plan and related documents impacting insurance. | 1.50 | 1,087.50 |
| Hudson, J. | 3/29/21 | Confer with AHC co-counsel re redlines to plan concerning open issue issues. | .10 | 72.50 |
| Grim, E. | 3/29/21 | Review new updates to plan. | .20 | 140.00 |
| Wolf, D. | 3/29/21 | Revise plan documents re D&O insurance coverage rights. | 2.50 | 1,750.00 |
| Wolf, D. | 3/29/21 | Confer with counsel for Debtors, UCC, and AHC re Sackler-related plan documents. | .60 | 420.00 |
| Gilbert, S. | 3/30/21 | Confer with Debtors re plan. | 1.00 | 1,700.00 |
| Shore, R. | 3/30/21 | Comment on update re plan issues. | .20 | 270.00 |
| Hudson, J. | 3/30/21 | Confer with Debtors' counsel (S. Massman) re insurance-related edits to plan. | 1.00 | 725.00 |
| Hudson, J. | 3/30/21 | Review D&O-related provisions of plan and consider options for finalizing. | .10 | 72.50 |
| Hudson, J. | 3/30/21 | Confer with co-counsel for AHC re insurance-related edits to plan per discussion with Debtors' counsel (S. Massman). | 1.10 | 797.50 |
| Wolf, D. | 3/30/21 | Revise plan documents re D&O insurance coverage rights. | 1.30 | 910.00 |
| Gilbert, S. | 3/31/21 | Confer with L. Fogelman (DOJ) re plan. | .50 | 850.00 |
| Gilbert, S. | 3/31/21 | Confer with Debtors re plan. | 1.30 | 2,210.00 |
| Gilbert, S. | 3/31/21 | Confer with Houlihan Lokey re plan issues. | .50 | 850.00 |
| Quinn, K. | 3/31/21 | Confer with Debtors' counsel re channeling injunction question. | .30 | 330.00 |
| Hudson, J. | 3/31/21 | Revise insurance-related language in plan per discussion with Debtors' counsel (S. Massman). | 1.80 | 1,305.00 |
| Hudson, J. | 3/31/21 | Confer with Debtors' counsel (S. Massman) re revisions to plan. | .30 | 217.50 |
| Grim, E. | 3/31/21 | Review updated insurance-related plan provisions. | .20 | 140.00 |
| Wolf, D. | 3/31/21 | Revise plan documents re D&O insurance coverage rights. | .60 | 420.00 |

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|-----------------------|---------|--|---------------|----------------------|
| Wolf, D. | 3/31/21 | Confer with client representatives and outside counsel re drafting plan documents. | 1.10 | 770.00 |
| Project Total: | | | 309.60 | \$ 301,329.00 |

A020: Insurance Adversary Proceeding

| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Shore, R. | 3/01/21 | Review and provide comments to adversary proceeding task outline. | .50 | 675.00 |
| Shore, R. | 3/01/21 | Review correspondence from insurers re pretrial conference and briefing schedule. | .30 | 405.00 |
| Hudson, J. | 3/01/21 | Review pretrial plan. | .10 | 72.50 |
| Hudson, J. | 3/01/21 | Analyze response to insurers' position on briefing schedule and pretrial conference. | .20 | 145.00 |
| Rubinstein, J. | 3/01/21 | Revise discovery / trial preparation outline (0.7); review article re personal jurisdiction over foreign insurers and case law cited therein (3.3); confer with bankruptcy team (K. Quinn, E. Grim, S. Sraders, J. Sanchez), litigation team (R. Leveridge, J. Rubinstein, M. Rush), and insurance recovery team (R. Shore and A. Gaske) re status and strategy (0.6); analyze document compilation and production issues (1.7); review insurer response re briefing schedule note to court and provide thoughts on proposed response (0.3). | 6.60 | 5,280.00 |
| Rush, M. | 3/01/21 | Confer with R. Leveridge, R. Shore, J. Rubinstein, J. Hudson, A. Gaske re case status and strategy. | .60 | 405.00 |
| Rush, M. | 3/01/21 | Communications with team re document productions in underlying litigation. | 2.30 | 1,552.50 |
| Johnson, K. | 3/01/21 | Communicate with D. Windscheffel re status of Marsh production. | .20 | 46.00 |
| Leveridge, R. | 3/01/21 | Review response from insurers re proposed order and letter to Court re briefing schedule (0.5); communications with Debtors' counsel and UCC counsel re same (0.6). | 1.10 | 1,540.00 |
| Leveridge, R. | 3/01/21 | Review draft to-do list and time table. | .90 | 1,260.00 |
| Leveridge, R. | 3/01/21 | Analyze legal issues relevant to impending motions practice (0.8); review case law re same (0.6). | 1.40 | 1,960.00 |
| Shore, R. | 3/02/21 | Review letter to Judge Drain. | 1.00 | 1,350.00 |
| Shore, R. | 3/02/21 | Analyze insurance coverage as it relates to excluded parties. | 3.00 | 4,050.00 |
| Shore, R. | 3/02/21 | Review note to M. Auslander re litigation next steps. | .20 | 270.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|---|-------|----------|
| Hudson, J. | 3/02/21 | Revise response to insurers' position on motions briefing and pretrial conference. | .20 | 145.00 |
| Hudson, J. | 3/02/21 | Review materials relevant to briefing on Insurance Issues #46 and #47. | .10 | 72.50 |
| Rubinstein, J. | 3/02/21 | Provide comments on communication to insurer counsel re March 24 status conference and briefing schedule agreement. | .50 | 400.00 |
| Gaske, A. | 3/02/21 | Review Marsh production re relevant documents. | 1.90 | 950.00 |
| Leveridge, R. | 3/02/21 | Review communications from counsel for UCC re proposed status conference and disagreement with insurers' counsel re same (0.4); draft proposed response and revised letter to insurer counsel (1.1); conference call with counsel for Debtors and UCC re same (0.9); review communication to insurer counsel from Debtors' counsel (0.5). | 2.90 | 4,060.00 |
| Shore, R. | 3/03/21 | Confer with co-counsel re pre-trial conference. | .30 | 405.00 |
| Rubinstein, J. | 3/03/21 | Correspond with team re scheduling conference with insurer counsel (0.2); confer with R. Leveridge and S. Sraders re opposition to insurer motions to dismiss for lack of personal jurisdiction (0.7). | .90 | 720.00 |
| Gaske, A. | 3/03/21 | Draft summary of research completed on Insurance Issue #46. | .80 | 400.00 |
| Gaske, A. | 3/03/21 | Review Marsh production re insurer-specific facts. | 4.30 | 2,150.00 |
| Leveridge, R. | 3/03/21 | Communicate with Debtors and UCC counsel re motions practice (0.2); confer with J. Rubinstein and S. Sraders re personal jurisdiction issues (0.7); communications with Debtors' counsel and insurers' counsel re briefing schedule and pretrial conference (0.4). | 1.30 | 1,820.00 |
| Sraders, S. | 3/03/21 | Confer with R. Leveridge and J. Rubinstein re upcoming briefing. | .70 | 402.50 |
| Shore, R. | 3/04/21 | Review communication with Court re pre-trial conference and related matters. | 1.00 | 1,350.00 |
| Hudson, J. | 3/04/21 | Analyze motions practice re adversary proceeding. | .10 | 72.50 |
| Rubinstein, J. | 3/04/21 | Review strategy re response to insurers' upcoming motions to dismiss for lack of personal jurisdiction. | .50 | 400.00 |
| Gaske, A. | 3/04/21 | Review Marsh production re insurer-specific facts for Insurance Issue #46. | 5.80 | 2,900.00 |
| Gaske, A. | 3/04/21 | Review insurer-specific facts re Insurance Issue #46. | .70 | 350.00 |
| Leveridge, R. | 3/04/21 | Communicate with team re briefing schedule and proposed order. | .40 | 560.00 |
| Leveridge, R. | 3/04/21 | Review communication from Debtors' counsel to Court re briefing schedule and proposed order. | .40 | 560.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|---|-------|----------|
| Shore, R. | 3/05/21 | Confer with D. Wolf, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders, and A. Gaske re insurance recovery and bankruptcy proceeding strategy. | .80 | 1,080.00 |
| Hudson, J. | 3/05/21 | Confer with team re insurance recovery status and strategy. | .80 | 580.00 |
| Rubinstein, J. | 3/05/21 | Confer with team re case strategy and status. | .80 | 640.00 |
| Wolf, D. | 3/05/21 | Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders, and A. Gaske re insurance recovery and bankruptcy proceeding strategy. | .80 | 560.00 |
| Rush, M. | 3/05/21 | Confer with J. Rubinstein, R. Leveridge, A. Gaske, J. Hudson, and S. Sraders re case status and strategy | .80 | 540.00 |
| Gaske, A. | 3/05/21 | Revise chart re Insurance Issue #46 and insurer-specific facts. | 3.00 | 1,500.00 |
| Gaske, A. | 3/05/21 | Continue reviewing Marsh productions re insurer-specific facts. | .40 | 200.00 |
| Gaske, A. | 3/05/21 | Confer with R. Shore, J. Hudson, R. Leveridge and others re insurance status and next steps. | .80 | 400.00 |
| Leveridge, R. | 3/05/21 | Conference call with Debtors' counsel re search terms (0.2); confer with team re strategy and status (0.8); review additional communications with Debtors' and UCC counsel re search terms (0.2). | 1.20 | 1,680.00 |
| Leveridge, R. | 3/05/21 | Review previous communications (2020) with Debtors' counsel re search terms. | .30 | 420.00 |
| Sraders, S. | 3/05/21 | Review correspondence re research related to Insurance Issue #46. | .10 | 57.50 |
| Sraders, S. | 3/05/21 | Confer with R. Leveridge, R. Shore, J. Rubinstein, J. Hudson, D. Wolf, M. Rush, and A. Gaske re status of and next steps of insurance recovery. | .80 | 460.00 |
| Rubinstein, J. | 3/06/21 | Communicate with team re revision of search terms for searching Debtors' files re personal jurisdiction contracts of alien insurers. | .20 | 160.00 |
| Rubinstein, J. | 3/07/21 | Provide proposed comments to Reed Smith re personal jurisdiction search terms. | .80 | 640.00 |
| Leveridge, R. | 3/07/21 | Communicate with team re search terms. | .40 | 560.00 |
| Leveridge, R. | 3/07/21 | Review communication from Debtors' counsel re communication from AIG. | .60 | 840.00 |
| Shore, R. | 3/08/21 | Analyze next steps for insurance adversary proceeding. | 1.20 | 1,620.00 |
| Hudson, J. | 3/08/21 | Analyze options for pretrial schedule. | .20 | 145.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Rubinstein, J. | 3/08/21 | Analyze personal jurisdiction search terms (0.3); confer with R. Leveridge and M. Rush re same (0.4); confer with bankruptcy team (S. Gilbert, K. Quinn, S. Sraders), litigation team (R. Leveridge, J. Rubinstein, M. Rush), and insurance recovery team (R. Shore, D. Wolf, J. Hudson, A. Gaske) re status and strategy (0.5). | 1.20 | 960.00 |
| Rush, M. | 3/08/21 | Review search terms for document review. | 1.40 | 945.00 |
| Rush, M. | 3/08/21 | Confer with R. Leveridge and J. Rubinstein re personal jurisdiction issues. | .40 | 270.00 |
| Rush, M. | 3/08/21 | Confer with team re insurance recovery strategy and next steps. | .50 | 337.50 |
| Gaske, A. | 3/08/21 | Continue analyzing Marsh production re factual information. | 1.90 | 950.00 |
| Leveridge, R. | 3/08/21 | Review legal research relevant to personal jurisdiction issues. | .80 | 1,120.00 |
| Leveridge, R. | 3/08/21 | Confer with J. Rubinstein and M. Rush re personal jurisdiction issues. | .40 | 560.00 |
| Leveridge, R. | 3/08/21 | Communications with counsel for Debtors and UCC re search terms (0.5); review proposed search terms (1.7). | 2.20 | 3,080.00 |
| Leveridge, R. | 3/08/21 | Review plan language for issues relevant to insurance adversary proceeding. | .70 | 980.00 |
| Rubinstein, J. | 3/09/21 | Correspond with co-counsel re personal jurisdiction document search project (0.2); review correspondence re draft plan as relates to coverage issues (0.2). | .40 | 320.00 |
| Gaske, A. | 3/09/21 | Continue review of Marsh production re factual information. | 2.70 | 1,350.00 |
| Leveridge, R. | 3/09/21 | Communications with counsel for Debtors and UCC re search terms. | .90 | 1,260.00 |
| Leveridge, R. | 3/09/21 | Continue review of plan language relevant to issues in insurance adversary proceeding. | .40 | 560.00 |
| Sraders, S. | 3/09/21 | Research re Insurance Issue #46. | .60 | 345.00 |
| Rubinstein, J. | 3/10/21 | Confer with Debtors and UCC counsel re search terms as relates to review of documents re personal jurisdiction issue (0.7); analyze proposed modified searches (0.7). | 1.40 | 1,120.00 |
| Rush, M. | 3/10/21 | Confer with counsel re search terms for jurisdictional discovery. | .70 | 472.50 |
| Rush, M. | 3/10/21 | Draft search terms for jurisdictional discovery. | .90 | 607.50 |
| Gaske, A. | 3/10/21 | Revise search terms re documents for Insurance Issue #46. | 2.40 | 1,200.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Gaske, A. | 3/10/21 | Review Marsh production re factual information for Issue 46. | 2.20 | 1,100.00 |
| Gaske, A. | 3/10/21 | Confer with counsel for the Debtors, UCC, R. Leveridge, J. Rubinstein and M. Rush re discovery search terms in preparation for motions practice. | .70 | 350.00 |
| Leveridge, R. | 3/10/21 | Confer with counsel for Debtors and UCC re search term issues (0.7); review search terms (1.1). | 1.80 | 2,520.00 |
| Sraders, S. | 3/10/21 | Research re Insurance Issue #46. | 1.00 | 575.00 |
| Rubinstein, J. | 3/11/21 | Revise personal jurisdiction search terms to be run through Debtors' document repository (0.7); confer with R. Leveridge, M. Rush, A. Gaske, and S. Sraders re personal jurisdiction briefing issues (0.5); communicate with K. Johnson re research re foreign insurer participation in domestic litigation (0.5). | 1.70 | 1,360.00 |
| Rush, M. | 3/11/21 | Revise search terms for jurisdictional discovery. | 1.20 | 810.00 |
| Rush, M. | 3/11/21 | Confer with team re jurisdictional issues. | .50 | 337.50 |
| Johnson, K. | 3/11/21 | Research personal jurisdiction case law re foreign insurers. | 2.50 | 575.00 |
| Gaske, A. | 3/11/21 | Confer with R. Leveridge, M. Rush, J. Rubinstein, and S. Sraders re adversary proceeding strategy. | .50 | 250.00 |
| Gaske, A. | 3/11/21 | Review Marsh production re factual information. | 3.20 | 1,600.00 |
| Leveridge, R. | 3/11/21 | Meet with counsel for Debtors and counsel for UCC re search terms (1.4); confer with team re various issues (0.5). | 1.90 | 2,660.00 |
| Fastenau, L. | 3/11/21 | Research case re Liberty Mutual Insurance Europe SE and Swiss Re International SE for reference in personal jurisdiction filing. | 1.90 | 598.50 |
| Sraders, S. | 3/11/21 | Confer with R. Leveridge, M. Rush, J. Rubinstein, and A. Gaske re insurer contacts and personal jurisdiction. | .50 | 287.50 |
| Shore, R. | 3/12/21 | Analyze next steps for insurance recovery. | 1.00 | 1,350.00 |
| Rubinstein, J. | 3/12/21 | Review edits to personal jurisdiction search terms to be run though Debtors' documents and provide comments re same. | .50 | 400.00 |
| Rush, M. | 3/12/21 | Communications with co-counsel re search terms for jurisdictional discovery. | .60 | 405.00 |
| Johnson, K. | 3/12/21 | Continue researching personal jurisdiction case law re foreign insurers. | 4.80 | 1,104.00 |
| Gaske, A. | 3/12/21 | Review research needed re Insurance Issue #46. | .40 | 200.00 |
| Gaske, A. | 3/12/21 | Continue reviewing Marsh production re factual information. | .80 | 400.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Leveridge, R. | 3/12/21 | Confer with Debtors' counsel re plan language and issues relevant to insurance adversary proceeding. | .80 | 1,120.00 |
| Leveridge, R. | 3/12/21 | Review search term suggestions from counsel for UCC (0.6); confer with Debtors' counsel re custodian issue and search terms (0.8). | 1.40 | 1,960.00 |
| Leveridge, R. | 3/12/21 | Review status of projects re personal jurisdiction. | .40 | 560.00 |
| Hudson, J. | 3/15/21 | Confer with R. Leveridge re status of insurance recovery analysis. | .20 | 145.00 |
| Hudson, J. | 3/15/21 | Consider options for litigation schedule. | .10 | 72.50 |
| Rubinstein, J. | 3/15/21 | Analyze potential search terms for review of Debtors' documents re foreign insurer personal jurisdiction issues (0.2); review for March 24 case management conference (0.2). | .40 | 320.00 |
| Johnson, K. | 3/15/21 | Continue researching personal jurisdiction case law re foreign insurers. | 2.00 | 460.00 |
| Gaske, A. | 3/15/21 | Review additional Marsh documents re preparation for motions practice. | 3.60 | 1,800.00 |
| Leveridge, R. | 3/15/21 | Confer with J. Hudson re litigation issues and planning (0.2); review materials in preparation for pre-trial conference (1.8); communications with P. Breene (Debtors' counsel) re same (0.3). | 2.30 | 3,220.00 |
| Leveridge, R. | 3/15/21 | Communicate with Debtors' counsel and UCC counsel re search terms. | .40 | 560.00 |
| Fastenau, L. | 3/15/21 | Research case involving Ace Insurance S.A. N.V. and Certain Underwriters at Lloyd's of London for reference in personal jurisdiction filing. | 2.10 | 661.50 |
| Sraders, S. | 3/15/21 | Research re Insurance Issue #46 (0.4); draft outline re same (0.8). | 1.20 | 690.00 |
| Shore, R. | 3/16/21 | Confer with Debtors and UCC re adversary pre-trial conference and schedule related thereto. | .70 | 945.00 |
| Shore, R. | 3/16/21 | Analyze strategy re March 24 pre-trial conference and settlement/mediation push. | 1.30 | 1,755.00 |
| Hudson, J. | 3/16/21 | Analyze options for litigation schedule to be proposed at March 24 status conference. | .60 | 435.00 |
| Hudson, J. | 3/16/21 | Confer with Debtors (P. Breene, M. Venditto) and UCC (W. Usatine, S. Hanson) re options for litigation schedule to be proposed at March 24 status conference. | .70 | 507.50 |
| Hudson, J. | 3/16/21 | Analyze arbitration provisions and impact on discovery plan. | 2.80 | 2,030.00 |
| Hudson, J. | 3/16/21 | Analyze potential mechanisms for early settlement. | 1.00 | 725.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Rubinstein, J. | 3/16/21 | Analyze issues and strategy in preparation for case management conference (1.3); confer with Committee counsel and Debtors' counsel re same (0.7); review draft correspondence to insurer counsel re proposed case management order (0.1); begin analysis of research re docket litigation involving foreign insurers (0.4). | 2.50 | 2,000.00 |
| Rush, M. | 3/16/21 | Review scheduling and mediation issues. | 1.00 | 675.00 |
| Gaske, A. | 3/16/21 | Revise draft scheduling order. | .60 | 300.00 |
| Gaske, A. | 3/16/21 | Review remaining Marsh documents re preparation for motions practice. | 1.50 | 750.00 |
| Gaske, A. | 3/16/21 | Analyze Marsh documents previously tagged as relevant for reference in personal jurisdiction filing. | 5.90 | 2,950.00 |
| Leveridge, R. | 3/16/21 | Analyze issues in preparation for March 24 pretrial conference (0.8); confer with Debtors and UCC counsel re same (0.7); draft communications to insurer counsel (1.0); communications with Debtors and UCC counsel re same (0.2). | 2.70 | 3,780.00 |
| Leveridge, R. | 3/16/21 | Review material re personal jurisdiction. | .60 | 840.00 |
| Leveridge, R. | 3/16/21 | Analyze strategy for dealing with insurers. | .90 | 1,260.00 |
| Sraders, S. | 3/16/21 | Research re personal jurisdiction. | 2.30 | 1,322.50 |
| Shore, R. | 3/17/21 | Review pre-trial and schedule (1.0); review email to insurers re same (0.2). | 1.20 | 1,620.00 |
| Hudson, J. | 3/17/21 | Review strategy for additional research bearing on interpretation of arbitration provisions. | .10 | 72.50 |
| Hudson, J. | 3/17/21 | Review scheduling and protective order. | .30 | 217.50 |
| Rubinstein, J. | 3/17/21 | Analyze insurer protective order for case management hearing (0.7); analyze personal jurisdiction fact research re foreign insurers (0.8). | 1.50 | 1,200.00 |
| Johnson, K. | 3/17/21 | Finalize research re personal jurisdiction case law re foreign insurers. | 1.60 | 368.00 |
| Gaske, A. | 3/17/21 | Revise evidentiary chart in preparation for motions practice re Insurer #6. | 1.00 | 500.00 |
| Gaske, A. | 3/17/21 | Revise evidentiary chart in preparation for motions practice re Insurer #8. | 1.00 | 500.00 |
| Gaske, A. | 3/17/21 | Revise evidentiary chart in preparation for motions practice re Insurer #37. | 1.00 | 500.00 |
| Gaske, A. | 3/17/21 | Revise evidentiary chart in preparation for motions practice re Insurer #11. | 1.00 | 500.00 |
| Gaske, A. | 3/17/21 | Revise evidentiary chart in preparation for motions practice re Insurers #16 and #17. | 1.00 | 500.00 |
| Gaske, A. | 3/17/21 | Revise evidentiary chart in preparation for motions practice re Insurer #20. | 1.00 | 500.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Gaske, A. | 3/17/21 | Revise evidentiary chart in preparation for motions practice re Insurers #29 and #30. | 1.00 | 500.00 |
| Gaske, A. | 3/17/21 | Revise evidentiary chart in preparation for motions practice re Insurer #31. | 1.00 | 500.00 |
| Gaske, A. | 3/17/21 | Revise evidentiary chart in preparation for motions practice re Insurer #34. | 1.00 | 500.00 |
| Gaske, A. | 3/17/21 | Revise evidentiary chart in preparation for motions practice re Insurer #4. | .90 | 450.00 |
| Leveridge, R. | 3/17/21 | Review materials in preparation for pre-trial conference (3.7); review communications re proposed pretrial order (0.4); communications with counsel for Debtors and UCC re same (0.8). | 4.90 | 6,860.00 |
| Sraders, S. | 3/17/21 | Draft outline re legal analysis of personal jurisdiction issues. | 2.40 | 1,380.00 |
| Hudson, J. | 3/18/21 | Review coverage territory analysis for briefing on personal jurisdiction. | .10 | 72.50 |
| Rubinstein, J. | 3/18/21 | Review factual and case law analysis re personal jurisdiction issue. | .20 | 160.00 |
| Rubinstein, J. | 3/18/21 | Confer with Debtors' counsel and Committee counsel re personal jurisdiction search terms to be run through Debtors' documents (0.9); confer with team re same (0.4). | 1.30 | 1,040.00 |
| Rush, M. | 3/18/21 | Review memorandum re personal jurisdiction issues. | 1.30 | 877.50 |
| Rush, M. | 3/18/21 | Confer with R. Leveridge, J. Rubinstein and S. Sraders re personal jurisdiction research and discovery. | .40 | 270.00 |
| Rush, M. | 3/18/21 | Confer with Debtors and co-counsel re search terms. | .90 | 607.50 |
| Johnson, K. | 3/18/21 | Organize foreign insurer-related research (1.4), confer with S. Sraders re prior foreign insurer-related research (0.4). | 1.80 | 414.00 |
| Gaske, A. | 3/18/21 | Confer with R. Leveridge, J. Rubinstein, M. Rush, and S. Sraders re status of motions preparation. | .40 | 200.00 |
| Gaske, A. | 3/18/21 | Review case law related to certain provisions in insuring agreement. | 2.30 | 1,150.00 |
| Gaske, A. | 3/18/21 | Review evidentiary patterns re preparation for motions practice. | .90 | 450.00 |
| Gaske, A. | 3/18/21 | Confer with Debtors' counsel and others re discovery search terms re preparation for motions practice. | .90 | 450.00 |
| Gaske, A. | 3/18/21 | Analyze research topics / issues for oppositions to motions to dismiss. | .20 | 100.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|---|-------|----------|
| Leveridge, R. | 3/18/21 | Review factual and legal research re issues relevant to expected motion to dismiss (1.9); meet with M. Rush, A. Gaske, J. Rubinstein and S. Sraders re same (0.4); confer with Reed Smith (A. Crawford) and others re search terms (0.9). | 3.20 | 4,480.00 |
| Sraders, S. | 3/18/21 | Confer with K. Johnson re personal jurisdiction research re insurer litigation. | .40 | 230.00 |
| Sraders, S. | 3/18/21 | Confer with R. Leveridge, J. Rubinstein, M. Rush and A. Gaske re legal and factual research re insurer contacts. | .40 | 230.00 |
| Shore, R. | 3/19/21 | Review response to insurer letter re pre-trial conference. | .50 | 675.00 |
| Shore, R. | 3/19/21 | Confer with team re insurance strategy and status. | .50 | 675.00 |
| Hudson, J. | 3/19/21 | Review insurers' position re status conference and motions practice as set forth in March 19 letter. | .10 | 72.50 |
| Hudson, J. | 3/19/21 | Confer with R. Shore, R. Leveridge, J. Rubinstein, D. Wolf, M. Rush, S. Sraders and A. Gaske re insurance recovery status and strategy. | .50 | 362.50 |
| Hudson, J. | 3/19/21 | Communicate with plaintiffs' team re Judge Drain request to move time of status conference. | .10 | 72.50 |
| Rubinstein, J. | 3/19/21 | Confer with bankruptcy and litigation teams re strategy (0.5); review correspondence re March 24 case management conference, insurer correspondence re same, and personal jurisdiction factual research (1.7). | 2.20 | 1,760.00 |
| Wolf, D. | 3/19/21 | Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, M. Rush, S. Sraders, and A. Gaske re insurance strategy. | .50 | 350.00 |
| Rush, M. | 3/19/21 | Revise jurisdictional search terms. | .50 | 337.50 |
| Rush, M. | 3/19/21 | Confer with team re next steps for insurance recovery. | .50 | 337.50 |
| Gaske, A. | 3/19/21 | Revise discovery search terms re preparation for motions practice. | .90 | 450.00 |
| Gaske, A. | 3/19/21 | Review additional case law re certain provisions in insuring agreements. | 3.00 | 1,500.00 |
| Gaske, A. | 3/19/21 | Draft summary of case law re certain provisions in insuring agreement. | 1.00 | 500.00 |
| Gaske, A. | 3/19/21 | Review additional factual information (0.5); revise evidentiary chart re preparation for motions practice (1.3). | 1.80 | 900.00 |
| Gaske, A. | 3/19/21 | Confer with insurance and litigation team (R. Shore, R. Leveridge, D. Wolf, J. Hudson, J. Rubinstein, M. Rush, and S. Sraders) re case update. | .50 | 250.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Leveridge, R. | 3/19/21 | Confer with team re insurance recovery, strategy and status. | .50 | 700.00 |
| Leveridge, R. | 3/19/21 | Communications with P. Breene (Debtors' counsel) re preparation for pretrial conference (1.1); review communication from insurer counsel re same (0.5); communications with Debtors and UCC counsel re same (0.3). | 1.90 | 2,660.00 |
| Sraders, S. | 3/19/21 | Review correspondence from insurers re scheduling. | .10 | 57.50 |
| Sraders, S. | 3/19/21 | Confer with R. Leveridge, J. Rubinstein, R. Shore, J. Hudson, D. Wolf, M. Rush, and A. Gaske re current status of insurance matters and next steps. | .50 | 287.50 |
| Shore, R. | 3/20/21 | Review draft letter to insurers. | .20 | 270.00 |
| Hudson, J. | 3/20/21 | Revise letter to insurers re status conference and motions practice. | .20 | 145.00 |
| Hudson, J. | 3/20/21 | Confer with counsel for Debtors and UCC re letter to insurers re status conference and motions practice. | .20 | 145.00 |
| Rubinstein, J. | 3/20/21 | Provide comments to response letter to insurers re March 24 court conference. | .40 | 320.00 |
| Leveridge, R. | 3/20/21 | Draft response to insurer letter re pretrial conference (2.1); communications with Debtors and UCC counsel re same (0.5); review revised drafts of response (0.7). | 3.30 | 4,620.00 |
| Shore, R. | 3/21/21 | Review correspondence re pre-trial conference (0.2); confer with R. Leveridge re same (0.4); revise draft letter to insurers re same (0.9). | 1.50 | 2,025.00 |
| Hudson, J. | 3/21/21 | Review materials in preparation for status conference. | .30 | 217.50 |
| Rubinstein, J. | 3/21/21 | Communicate with R. Leveridge and J. Hudson re draft letter to insurers re March 24 court conference (0.3); review additional edits and correspondence re same (0.5). | .80 | 640.00 |
| Leveridge, R. | 3/21/21 | Communicate with team re response to insurer letter (0.3); revise same (0.7); communicate with Debtors' counsel re same (0.2); review revised communication to insurers (0.7); communicate with P. Breene re same (0.4). | 2.30 | 3,220.00 |
| Shore, R. | 3/22/21 | Confer with J. Rubinstein and R. Leveridge re adversary proceeding strategy. | .50 | 675.00 |
| Shore, R. | 3/22/21 | Review and revise draft response to insurer submission to Judge Drain letter. | 1.80 | 2,430.00 |
| Hudson, J. | 3/22/21 | Draft response to insurer letter requesting to adjourn status conference. | 2.70 | 1,957.50 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Hudson, J. | 3/22/21 | Review insurer motion to withdraw reference. | .10 | 72.50 |
| Rubinstein, J. | 3/22/21 | Review personal jurisdiction factual research in support of upcoming opposition to motion to dismiss (0.9); review case law re personal jurisdiction analysis in preparation for upcoming motion to dismiss briefing (0.9); review correspondence from insurer counsel re March 24 hearing and motions to withdraw reference and for stay of litigation (0.3); confer with R. Shore and R. Leveridge re adversary proceeding strategy (0.5); review draft response to insurer submission to Judge Drain, provide proposed edits to same (1.8); review insurer submission to Judge Drain re March 24 hearing (0.2). | 4.60 | 3,680.00 |
| Rush, M. | 3/22/21 | Review motion to withdraw reference. | .60 | 405.00 |
| Johnson, K. | 3/22/21 | Review and organize pleadings recently filed in adversary proceeding. | .20 | 46.00 |
| Johnson, K. | 3/22/21 | Research foreign insurers' financial statements. | 4.30 | 989.00 |
| Johnson, K. | 3/22/21 | Review documents re U.S. contacts re foreign insurers. | .20 | 46.00 |
| Leveridge, R. | 3/22/21 | Review communications from insurers re proposed schedule (0.5); review letter from insurers to Judge Drain (0.2); review insurers' motion to withdraw the reference (1.8); communications with other plaintiffs' counsel re same (1.1); revise responsive letter to Judge Drain (0.8); communications with other plaintiffs' counsel re same (0.8). | 5.20 | 7,280.00 |
| Leveridge, R. | 3/22/21 | Confer with R. Shore and J. Rubinstein re adversary proceeding status and strategy. | .70 | 980.00 |
| Fastenau, L. | 3/22/21 | Research gross net premiums in US for certain foreign insurers. | 3.20 | 1,008.00 |
| Sraders, S. | 3/22/21 | Research previous determinations of personal jurisdiction over insurers. | 1.20 | 690.00 |
| Sraders, S. | 3/22/21 | Analyze motion to withdraw reference filed by insurers. | .10 | 57.50 |
| Shore, R. | 3/23/21 | Meet-and-confer with insurers re pre-trial conference (0.8); confer with plaintiffs' counsel re next steps (0.4). | 1.20 | 1,620.00 |
| Hudson, J. | 3/23/21 | Review materials in preparation for status conference. | .20 | 145.00 |
| Hudson, J. | 3/23/21 | Review insurers letter to Judge Drain re arbitration. | .10 | 72.50 |
| Hudson, J. | 3/23/21 | Review insurers letter to Judge Drain re personal jurisdiction and other forthcoming motions. | .10 | 72.50 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Hudson, J. | 3/23/21 | Analyze potential discovery topics relevant to likely coverage defenses. | .40 | 290.00 |
| Rubinstein, J. | 3/23/21 | Review Liberty motion to withdraw the reference (0.9); review agenda re March 24 hearing (0.2); review factual research re foreign insurer operations in United States as relates to motion to dismiss briefing (2.3); review letter from Chubb Bermuda to Court re March 24 hearing and position of arbitration insurers (0.3); review Liberty letter to Court re March 24 hearing (0.2). | 3.90 | 3,120.00 |
| Johnson, K. | 3/23/21 | Continue to review documents re U.S. contacts of foreign insurers. | .80 | 184.00 |
| Gaske, A. | 3/23/21 | Analyze research question from S. Sraders re preparation for motions practice. | .40 | 200.00 |
| Gaske, A. | 3/23/21 | Review certain insurer policies re coverage territory. | .70 | 350.00 |
| Leveridge, R. | 3/23/21 | Review materials and issues in preparation for pretrial conference (1.9); communications with Debtors' counsel and UCC counsel re schedule (0.3); review issues in preparation for meet-and-confer with insurers re schedule (0.2); participate in meet-and-confer with insurers (0.7); follow-up communications with plaintiffs' counsel re same (0.3). | 3.40 | 4,760.00 |
| Leveridge, R. | 3/23/21 | Review letters from insurers re pretrial conference and motion to withdraw reference (0.2); communication with P. Breene re draft talking points for conference (0.3); revise same (0.8). | 1.30 | 1,820.00 |
| Sraders, S. | 3/23/21 | Revise chart re insurer contacts with U.S. courts. | 1.30 | 747.50 |
| Gilbert, S. | 3/24/21 | Attend hearing. | 1.00 | 1,700.00 |
| Shore, R. | 3/24/21 | Confer with Debtors and UCC counsel re prepare for pre-trial conference. | .90 | 1,215.00 |
| Shore, R. | 3/24/21 | Review and analyze Issue #52. | 1.70 | 2,295.00 |
| Shore, R. | 3/24/21 | Attend pre-trial conference (adjourned) (1.0); communicate with AHC re same (0.5). | 1.50 | 2,025.00 |
| Hudson, J. | 3/24/21 | Attend portion of omnibus hearing before pre-trial conference was rescheduled. | 1.00 | 725.00 |
| Hudson, J. | 3/24/21 | Review materials and issues in preparation for originally scheduled pre-trial conference. | 1.10 | 797.50 |
| Hudson, J. | 3/24/21 | Draft summary of upcoming pre-trial conference for Ad Hoc Committee. | .40 | 290.00 |
| Hudson, J. | 3/24/21 | Participate in rescheduling of pre-trial conference at Judge Drain's request. | .10 | 72.50 |
| Hudson, J. | 3/24/21 | Analyze argument presented by Insurer #31 in settlement discussions. | .10 | 72.50 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Grim, E. | 3/24/21 | Communicate with G. Cicero re insurance adversary proceeding. | .10 | 70.00 |
| Rubinstein, J. | 3/24/21 | Review Windstream decision re insurer argument re impact of jury trial demand (0.9); participate in pre-hearing call re strategy call with co-counsel (1.0); attend March 24 court hearing prior to termination and rescheduling conference (1.1); factual analysis re personal jurisdiction issues (0.3); review analysis of coverage territory provisions circulated by A. Gaske as relates to personal jurisdiction motions and provide comments re same (0.3). | 3.60 | 2,880.00 |
| Gaske, A. | 3/24/21 | Review remaining certain insurance policies re coverage territory. | 3.70 | 1,850.00 |
| Gaske, A. | 3/24/21 | Revise insurer-specific fact chart re preparation for motions practice. | 1.80 | 900.00 |
| Leveridge, R. | 3/24/21 | Analyze issues and materials in preparation for pretrial conference (1.8); participate in pre-hearing call with co-counsel (1.0); attend pre-trial conference (1.0); confer with court re rescheduling (0.1); communications with team re same (1.0). | 4.90 | 6,860.00 |
| Shore, R. | 3/25/21 | Review Ford decision re personal jurisdiction. | .50 | 675.00 |
| Hudson, J. | 3/25/21 | Review new Supreme Court ruling re personal jurisdiction. | .20 | 145.00 |
| Hudson, J. | 3/25/21 | Analyze Insurer #31 argument that it is not a proper named party. | .10 | 72.50 |
| Hudson, J. | 3/25/21 | Communicate with Debtors and UCC on briefing schedule for opposition to motion to withdraw the reference. | .20 | 145.00 |
| Rubinstein, J. | 3/25/21 | Review correspondence re Tenecom as a named defendant (0.1); communications with Debtors' counsel re briefing schedule for motion to withdraw the reference (0.2); review article discussing tranche of opioid related documents being made publicly available (0.4); confer with team re personal jurisdiction issues (0.6); analyze new U.S. Supreme Court decision re specific jurisdiction (1.4). | 2.70 | 2,160.00 |
| Rush, M. | 3/25/21 | Confer with team re personal jurisdiction issues. | .60 | 405.00 |
| Rush, M. | 3/25/21 | Review issues re proper Tenecom party. | .80 | 540.00 |
| Gaske, A. | 3/25/21 | Revise insurer-specific fact chart re preparation for motions practice. | 2.90 | 1,450.00 |
| Gaske, A. | 3/25/21 | Confer with J. Rubinstein, M. Rush and S. Sraders re preparation for upcoming motions practice. | .60 | 300.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|---------|--|-------|----------|
| Leveridge, R. | 3/25/21 | Communications with Debtors' counsel re plan for addressing schedule for insurers' motion to withdraw. | 1.10 | 1,540.00 |
| Leveridge, R. | 3/25/21 | Review communications between Debtors' counsel and insurer counsel re rescheduling pretrial conference. | .40 | 560.00 |
| Leveridge, R. | 3/25/21 | Review new Supreme Court case (Ford Motor) re personal jurisdiction. | 1.20 | 1,680.00 |
| Sraders, S. | 3/25/21 | Confer with J. Rubinstein, M. Rush, and A. Gaske re ongoing personal jurisdiction research and analysis. | .60 | 345.00 |
| Sraders, S. | 3/25/21 | Research re electronic communications in personal jurisdiction analysis. | .40 | 230.00 |
| Shore, R. | 3/26/21 | Confer with J. Rubinstein re personal jurisdiction issue. | .40 | 540.00 |
| Hudson, J. | 3/26/21 | Communicate with Debtors and UCC re briefing schedule for opposition to motion to withdraw the reference. | .20 | 145.00 |
| Hudson, J. | 3/26/21 | Analyze Insurer #31 argument that it is not a properly named party. | .10 | 72.50 |
| Rubinstein, J. | 3/26/21 | Confer with R. Shore re personal jurisdiction issue. | .40 | 320.00 |
| Gaske, A. | 3/26/21 | Review case law involving Insurer #26 re preparation for motions practice. | 1.10 | 550.00 |
| Leveridge, R. | 3/26/21 | Review communications between Debtors' counsel and insurer counsel re briefing for motion to withdraw. | .80 | 1,120.00 |
| Leveridge, R. | 3/27/21 | Review language from draft cooperation agreement with Debtors (0.5); propose edits to same (0.4). | .90 | 1,260.00 |
| Hudson, J. | 3/28/21 | Communicate with Debtors re analysis on Insurer #31 argument that it is not a properly named party. | .20 | 145.00 |
| Gaske, A. | 3/28/21 | Review case law involving certain insurers re preparation for motions practice. | 1.40 | 700.00 |
| Hudson, J. | 3/29/21 | Review verification of Insurer #31 position that it is not a proper named party. | .40 | 290.00 |
| Hudson, J. | 3/29/21 | Confer with Debtors (P. Breene) and counsel for Insurer 31 re whether it is a proper named party. | .30 | 217.50 |
| Hudson, J. | 3/29/21 | Confer with Debtors (P. Breene) re substituting Insurer #31 as defendant. | .20 | 145.00 |
| Johnson, K. | 3/29/21 | Research pleadings re foreign insurers. | .50 | 115.00 |
| Gaske, A. | 3/29/21 | Review case law involving certain insurers (3.0); draft summary of same re preparation for motions practice (1.6). | 4.60 | 2,300.00 |

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| Name | Date | Services | Hours | Amount |
|----------------|-------------|--|--------------|---------------|
| Leveridge, R. | 3/29/21 | Review analysis of contact in U.S. by foreign insurers. | .90 | 1,260.00 |
| Shore, R. | 3/30/21 | Confer with team re insurance litigation status and strategy. | .70 | 945.00 |
| Hudson, J. | 3/30/21 | Communicate with Debtors (P. Breene) and insurer counsel re substitution of Insurer #31. | .20 | 145.00 |
| Hudson, J. | 3/30/21 | Confer with team re insurance recovery status and strategy. | .70 | 507.50 |
| Rubinstein, J. | 3/30/21 | Confer with team re adversary proceeding strategy (0.7); outline topics for jurisdictional discovery (0.5); review concurring opinions in Ford decision re personal jurisdiction (0.5); review analysis of case law hits of foreign insurers in U.S. courts re personal jurisdiction (0.4) | 2.10 | 1,680.00 |
| Wolf, D. | 3/30/21 | Confer with R. Shore, R. Leveridge, J. Rubinstein, J. Hudson, S. Sraders, and A. Gaske re discovery in insurance adversary proceeding. | .70 | 490.00 |
| Gaske, A. | 3/30/21 | Review recent Supreme Court case re personal jurisdiction. | .90 | 450.00 |
| Gaske, A. | 3/30/21 | Confer with team re insurance recovery strategy. | .70 | 350.00 |
| Gaske, A. | 3/30/21 | Communicate with S. Sraders, R. Leveridge, and J. Rubinstein re draft discovery. | .60 | 300.00 |
| Leveridge, R. | 3/30/21 | Confer with team re next steps in adversary proceeding. | .70 | 980.00 |
| Leveridge, R. | 3/30/21 | Communicate with team re jurisdictional discovery (0.6); communicate with Debtors' counsel re status of document search (0.2); review legal research re jurisdictional issues (0.9). | 1.70 | 2,380.00 |
| Leveridge, R. | 3/30/21 | Communicate with Debtors' counsel re pretrial conference. | .20 | 280.00 |
| Sraders, S. | 3/30/21 | Confer with J. Hudson, R. Leveridge, R. Shore, J. Rubinstein, D. Wolf, and A. Gaske re status of and strategy for ongoing efforts re insurance recovery. | .70 | 402.50 |
| Shore, R. | 3/31/21 | Confer with plaintiffs' counsel re response to insurers. | .50 | 675.00 |
| Shore, R. | 3/31/21 | Review and provide comments for talking points for hearing. | .30 | 405.00 |
| Hudson, J. | 3/31/21 | Confer with co-counsel (Debtors and UCC) re substituting Insurer #31 as defendant. | .50 | 362.50 |
| Hudson, J. | 3/31/21 | Revise talking points for reset pretrial conference. | .20 | 145.00 |
| Hudson, J. | 3/31/21 | Confer with counsel for Insurer #31 and Debtors (P. Breene) re substituting Insurer 31 as defendant. | .10 | 72.50 |

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| Name | Date | Services | Hours | Amount |
|-------------------------------|-------------|--|---------------|----------------------|
| Rubinstein, J. | 3/31/21 | Communications with team re strategy associated with jurisdictional discovery (0.3); review correspondence re Tenecom as a named defendant and substitution of Tenecom as a party (0.2); provide comments to R. Leveridge re April 6 hearing talking points (0.4). | .90 | 720.00 |
| Gaske, A. | 3/31/21 | Review example requests for production (1.5); draft requests for production (3.9). | 5.40 | 2,700.00 |
| Leveridge, R. | 3/31/21 | Communications with counsel for Debtors re pretrial conference on April 6 (0.2); review issues in preparation for pre-trial conference (1.7). | 1.90 | 2,660.00 |
| Leveridge, R. | 3/31/21 | Review filing in the district court re assigned judge (0.9); communications with counsel for Debtors and UCC re same (0.4). | 1.30 | 1,820.00 |
| Leveridge, R. | 3/31/21 | Communications with plaintiffs' counsel re XL/Tenecom issue (0.2); review policy language (0.4); review communications with XL's counsel (0.2). | .80 | 1,120.00 |
| Sraders, S. | 3/31/21 | Correspond with A. Gaske re personal jurisdiction discovery. | .50 | 287.50 |
| Project Total: | | | 312.30 | \$ 259,680.00 |
| TOTAL CHARGEABLE HOURS | | | 715.20 | |
| TOTAL FEES | | | | \$ 662,991.50 |

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TIMEKEEPER SUMMARY

| Timekeeper | Hours | Rate | Total |
|----------------|---------------|----------|----------------------|
| Gilbert, S. | 95.60 | 1,700.00 | 162,520.00 |
| Quinn, K. | 37.20 | 1,100.00 | 40,920.00 |
| Shore, R. | 58.10 | 1,350.00 | 78,435.00 |
| Holland, P. | 6.70 | 290.00 | 1,943.00 |
| Hudson, J. | 91.30 | 725.00 | 66,192.50 |
| Grim, E. | 48.10 | 700.00 | 33,670.00 |
| Rubinstein, J. | 44.10 | 800.00 | 35,280.00 |
| Wolf, D. | 53.80 | 700.00 | 37,660.00 |
| Rush, M. | 18.50 | 675.00 | 12,487.50 |
| Johnson, K. | 23.60 | 230.00 | 5,428.00 |
| Gaske, A. | 95.00 | 500.00 | 47,500.00 |
| Leveridge, R. | 75.20 | 1,400.00 | 105,280.00 |
| Ogrey, S. | 4.50 | 230.00 | 1,035.00 |
| Fastenau, L. | 7.20 | 315.00 | 2,268.00 |
| Sraders, S. | 56.30 | 575.00 | 32,372.50 |
| TOTALS | 715.20 | | \$ 662,991.50 |

TASK SUMMARY

| Task | Description | Hours | Amount |
|------|--|--------|------------|
| A001 | Asset Analysis & Recovery | 19.90 | 16,764.50 |
| A004 | Case Administration | 11.10 | 17,482.50 |
| A006 | Employment / Fee Applications | 8.20 | 2,993.00 |
| A009 | Meetings / Communications with AHC & Creditors | 54.10 | 64,742.50 |
| A019 | Plan of Reorganization / Disclosure Statement | 309.60 | 301,329.00 |
| A020 | Insurance Adversary Proceeding | 312.30 | 259,680.00 |

EXPENSE DETAILS

E105: Telephone

| Date | Description | Task | Amount |
|---------|---|------|-----------------|
| 3/24/21 | Conference Call / Courtcall / Richard Leveridge / Attend Omnibus Hearing / 03/24/2021 | E105 | 70.00 |
| | Sub-Total of Expenses: | | \$ 70.00 |

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E106: Online Research

| Date | Description | Task | Amount |
|-------------------------------|--------------------|-------------|--------------------|
| 3/01/21 | Lexis | E106 | 70.44 |
| 3/28/21 | Lexis | E106 | 105.64 |
| 3/31/21 | Lexis | E106 | 117.39 |
| 3/31/21 | Westlaw | E106 | 2,234.90 |
| 3/31/21 | PACER | E106 | 136.60 |
| Sub-Total of Expenses: | | | \$ 2,664.97 |

E111: Meals

| Date | Description | Task | Amount |
|-------------------------------|---|-------------|-----------------|
| 3/02/21 | Business Meals / S. Gilbert / Lunch with K. Feinberg / 2021.03.02 | E111 | 69.57 |
| Sub-Total of Expenses: | | | \$ 69.57 |

TOTAL EXPENSES **\$ 2,804.54**

TOTAL FEES AND EXPENSES **\$ 665,796.04**